

FRANK T. MARTINEZ  
City Clerk

KAREN E. KALFAYAN  
Executive Officer

When making inquiries  
relative to this matter  
refer to File No.

# CITY OF LOS ANGELES

CALIFORNIA



JAMES K. HAHN  
MAYOR

Office of the  
CITY CLERK  
Council and Public Services  
Room 395, City Hall  
Los Angeles, CA 90012  
Council File Information - (213) 978-1043  
General Information - (213) 978-1133  
Fax: (213) 978-1040

HELEN GINSBURG  
Chief, Council and Public Services Division

PLACE IN FILES

05-0671

MAY 31 2005

CDs 2, 3, 7, & 12

DEPUTY

May 25, 2005

Los Angeles County Tax Assessor  
500 W. Temple Street, Room 290  
Los Angeles, CA 90012

Councilmember Greuel  
Councilmember Padilla  
Councilmember Zine  
City Administrative Officer  
Chief Legislative Analyst  
Geographic Information Section  
Attn: Fae Tsukamoto  
Bureau of Engineering,  
Land Development Group  
Bureau of Street Lighting,  
"B" Permit Section

Councilmember Smith  
Director of Planning  
Department of Transportation,  
Traffic/Planning Sections  
Department of Building & Safety  
c/o Zoning Coordinator  
cc: Residential Inspection Unit  
Community Planning Section  
City Planning Department  
Attn: Dan Scott,  
Attn: Susan Whisnant  
Department of Water & Power  
Board of Water & Power Commissioners  
Attn: Barbara Moschos  
Information Technology Agency

Local Agency Formation Commission  
500 W. Temple Street, Room 383  
Los Angeles, CA 90012

RE: AMENDMENT TO THE BOUNDARIES OF THE SPHERE OF INFLUENCE FOR THE CITY OF  
LOS ANGELES PURSUANT TO THE CORTESE-KNOX-HERTZBERG LOCAL GOVERNMENT  
REORGANIZATION ACT OF 2000

At the meeting of the Council held May 10, 2005, the following action was  
taken:

|                                   |          |
|-----------------------------------|----------|
| Attached report adopted.....      | X        |
| Attached resolution adopted.....  | X        |
| Mayor concurred .....             | 05-23-05 |
| To the Mayor FORTHWITH .....      | X        |
| Mayor approved .....              |          |
| Findings adopted.....             | X        |
| Negative Declaration adopted..... | X        |

*Frank T. Martinez*

City Clerk  
SOS

steno/050671a



OFFICE OF THE MAYOR  
RECEIVED  
Mayor's Time Stamp  
2005 MAY 11 AM 8:13  
CITY OF LOS ANGELES

FORTHWITH

RECEIVED  
CITY CLERK'S OFFICE  
City Clerk's Time Stamp  
2005 MAY 11 AM 8:12  
CITY CLERK  
BY \_\_\_\_\_  
DEPUTY

SUBJECT TO THE CONCURRENCE OF THE MAYOR

COUNCIL FILE NO. 05-0671

COUNCIL DISTRICT NO. 2, 3, 7 & 12

COUNCIL APPROVAL DATE May 10, 2005

RE: AMENDMENT TO THE BOUNDARIES OF THE SPHERE OF INFLUENCE (SOI) FOR THE  
CITY OF LOS ANGELES PURSUANT TO THE CORTESE-KNOX-HERTZBERG LOCAL  
GOVERNMENT REORGANIZATION ACT OF 2000

MAY 23 2005

LAST DAY FOR MAYOR TO ACT \_\_\_\_\_  
(10 Day Charter requirement as per Charter Section 231H)

RECEIVED  
CITY CLERK'S OFFICE  
2005 MAY 23 PM 4:14  
CITY CLERK  
DEPUTY

DO NOT WRITE BELOW THIS LINE - FOR MAYOR OFFICE USE ONLY

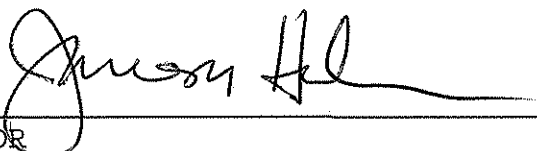
APPROVED  
✓

\*DISAPPROVED

\*Transmit objections in writing  
pursuant to Charter Section 231H

MAY 23 2005

DATE OF MAYOR APPROVAL OR DISAPPROVAL \_\_\_\_\_

  
MAYOR

35  
TO THE COUNCIL OF THE  
CITY OF LOS ANGELES

5-10  
FILE NO. 05-0671

Your

PLANNING AND LAND USE MANAGEMENT

Committee

reports as follows:

|                 |            |           |
|-----------------|------------|-----------|
|                 | <u>Yes</u> | <u>No</u> |
| Public Comments | <u>XX</u>  | <u>—</u>  |

NEGATIVE DECLARATION, PLANNING AND LAND USE MANAGEMENT COMMITTEE REPORT and RESOLUTION relative to amendment to the boundaries of the Sphere of Influence (SOI) for the City of Los Angeles pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

Recommendations for Council action, as initiated by Motion (Bernson - Galanter), SUBJECT TO THE CONCURRENCE OF THE MAYOR:

1. FIND that this project will not have a significant effect on the environment, pursuant to the City's Environmental Guidelines and is in compliance with the California Environmental Quality Act; that the Negative Declaration reflects the independent judgment of the lead agency City of Los Angeles; that the documents constituting the record of proceedings in this matter are located in Council file No. 05-0671 in the custody of the City Clerk and in the files of the Department of City Planning in the custody of the Environmental Review Section; and ADOPT the Negative Declaration [ENV 2004-7108 ND].
2. ADOPT the Findings of the Director of Planning as the Findings of City Council.
3. APPROVE the amendment to the boundaries of the SOI for the City of Los Angeles, pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, and as shown in the April 6, 2005 City Planning Department report, Exhibit A, to include areas near Dayton Canyon between the Ventura County Line and the City of Los Angeles on the west, north along the Ventura County line to the ridgeline of the Santa Susana Mountains, turning east following the ridgeline of the Santa Susana Mountains (west of the 405 Freeway), to the limits of the City of Santa Clarita at the Sierra Highway, then following the limits south and then east, and continuing to follow the ridgeline eastward to the boundary of the Angeles National Forest and the unincorporated areas to the terminus south of Little Tujunga Road, with some deviations to include unincorporated areas between the City of Los Angeles and Ventura County, and between the City of Los Angeles and the Angeles National Forest. Along the northern segment, the border was chosen to include unincorporated areas in the San Fernando Valley that are south of the natural ridgeline of the Santa Susana Mountains as shown in Exhibit B of the April 6, 2005, City Planning Department report.
4. ADOPT the accompanying RESOLUTION relative to an application by the City of Los Angeles, requesting the Local Agency Formation Commission of the County of Los Angeles to initiate proceedings to adopt an amended SOI proposed by the City of Los Angeles.
5. APPROVE the application to the Local Agency Formation Commission of the County of Los Angeles to amend the SOI, pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

Fiscal Impact Statement: None submitted by the Planning Department. Neither the City Administrative Officer nor the Chief Legislative Analyst has completed a financial analysis of this report.

Summary:

At its meeting held May 4, 2005, the Planning and Land Use Management Committee recommended that Council approve the accompanying report from the Director of Planning relative to an amendment to the boundaries of the

Sphere of Influence (SOI) for the City of Los Angeles; and an application to the Local Agency Formation Commission of the County of Los Angeles (LAFCO), to amend the sphere of influence, pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

The proposed amendment area for the City's SOI covers 19,242 acres, or slightly more than 30 square miles. The amendments are described and shown in Maps contained in the April 6, 2005, report prepared by the Planning Department (See Council file No. 05-0671.)

The Planning Department reported that on November 14, 2000, the City Council adopted a Motion (Bernson-Galanter, CF 00-2206), instructing the City Planning Department, with assistance from the Chief Legislative Analyst, to prepare an application to the Local Agency Formation Commission of the County of Los Angeles to amend the boundaries of the SOI for the City of Los Angeles pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. The SOI is the geographic area in Los Angeles County that is determined to be the probable, ultimate physical boundaries and service area for the City of Los Angeles. The current boundary of the sphere for the City of Los Angeles is coterminous with the incorporation limits, as shown on Exhibit A of the City Planning Department report dated April 6, 2005. The ridgeline separates the San Fernando Valley from the Santa Clarita Valley and defines the northern edge of the drainage basin for the San Fernando Valley. Water flowing from the southern face of the ridge feeds the Los Angeles River and the valley aquifer. Municipal services that are by the local agency located downward from the ridge. Slight modifications were made to account for ownership of parcels. The Planning Department further reported that, in general, the purpose of the SOI influence is to:

1. Facilitate orderly growth in the unincorporated areas adjacent to a city;
2. Coordinate property development standards, and encourage timely provision of adequate and essential services, such as parks, recreation, and flood control and, if urbanization of unincorporated areas occurs, streets, sewer, water, solid waste disposal, and police and fire protection;
3. Promote cooperative planning between the city and county, various public/private service entities, major landowners, and facilitate proper implementation of their respective general or master plans;
4. Assist all government agencies and private entities in any planning and scheduling for extension of their facilities and services to assure it will be done in a logical, orderly, and economical manner, thus avoiding expensive and unnecessary duplication of effort; and
5. Promote, assist, and enhance property owners' ability to plan comprehensively, and with reasonable assurance for the ultimate use and development of their lands.

The Planning Department further reported that portions of the Los Angeles River watershed that are in the proposed sphere of influence help mitigate flooding, maintain water quality and quantity, recycle nutrients, and provide an important habitat for plants and animals. The City Council established the Los Angeles Ad Hoc River Committee in June 2002 to focus on major revitalization efforts for the Los Angeles River including opportunities for parks, trails, recreation, nature, neighborhood identity, jobs, community development, tourism, and civic pride.

In addition, the Planning Department reported that, one of the guiding principles for the Los Angeles River is viewing the river as an important natural resource with emphasis on the ecology of the river, flood management, and sustainability. Encompassing the watershed for the Los Angeles River in the sphere of influence for the City of Los Angeles is both logical and paramount to the continued success of revitalization efforts. The Los Angeles River watershed is an important boundary on which to base the Sphere of Influence as it directly impacts the delivery of a wide range of services related to stormwater and water quality.

Councilmember Grieg Smith representing a portions of the San Fernando Valley spoke in support of the proposed SOI, as amended, and reported that the establishment of a SOI is not a land use, project sensitive action, but rather, a tool to protect the interest of the City of Los Angeles as it relates to land use in unincorporated areas. Councilmember Smith further reported that the recommendations, prepared by the City Planning Department, are in response to a City of Santa Clarita action in 2000. That action would have allowed the City of Santa Clarita to have a say in land use all the way to the Los Angeles border in the Interstate 5 traffic corridor. The Councilmember



noted that any development in this corridor, without and Los Angeles' input, would seriously impact the City's resources and traffic. The Councilmember noted that to do nothing would have been contrary to the best interest of the City of Los Angeles. He further reported that in June 2002, Las Lomas, as a development project was filed. At that time the City Attorney advised that the City of Los Angeles must process the EIR without prejudice, and that the decision on Las Lomas can only be made after the proper California Environmental Quality Impact process. In addition, the Councilmember reported noted that there are claims by the proponents of the Las Lomas project that the SOI is in reaction to - - and designed to stop the Las Lomas project. He suggested that legally that is not possible, and suggested that the Local Agency Formation Commission of the County project cannot consider land uses as part of the SOI process. Other comments made by Councilmember Smith are contained in Council file No. 05-0671.

Councilmember Alex Padilla, who also represents portions of the San Fernando Valley in the City, also spoke in support of the SOI, as amended, and agreed with Councilmember Greig Smith, and reported that the SOI will also provide the City with an opportunity to comment on proposed development, and the impact projects may have on the watershed for the Los Angeles River.

Several speakers offered testimony in support of the SOI as amended. A letter was submitted for the record by the Granada Hills Neighborhood Council, and the City of Santa Clarita provide a copy of a Resolution in support of the SOI, as amended.

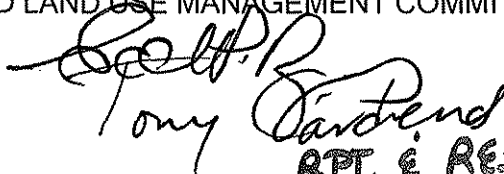
Several representatives for the Las Lomas project reported that, the Las Lomas project proposes annexation of the project area into the City of Los Angeles. The 555-acre site is situated in presently unincorporated territory between the City of Santa Clarita to the north and the City of Los Angeles to the south. These representatives reported that they believe that the Los Angeles Negative Declaration for the proposed SOI is legally deficient, and offered additional alternatives for the City to consider (See May 3, 2003, letter from Akin, Gump, Strauss Hauer and Feld - attached to Council file No. 05-0671).

Several speakers, including the Chatsworth Neighborhood Council offered testimony in opposition to the SOI, as amended. The Chatsworth Neighborhood Council reported that the County has completed extensive public outreach and has advised the public of its intentions for this area, as part of its General Plan update, which is to preserve the area, with housing not to exceed one home per ten acres. This Neighborhood Council reported that the City has not advised the public of its intentions. Other speakers expressed concerns related to traffic, density, the preservation open space, the impact of development on the watershed, the value of their property linked to the ability to obtain vital resources such as water and power, and on their overall concerns with the SOI, amendment as related to the Las Lomas Project.

After careful consideration of the documents on file, and of the testimony provided at the hearing, the Committee recommended to adopt the recommendations of the Planning Department, as submitted in the April 6, 2005, report and Resolution.

Respectfully submitted,

PLANNING AND LAND USE MANAGEMENT COMMITTEE

  
RPT. & RESO.  
**ADOPTED**

MAY 10 2005

| <u>MEMBER</u> | <u>VOTE</u> |
|---------------|-------------|
| REYES:        | YES         |
| CARDENAS:     | YES         |
| WEISS:        | ABSENT      |

BG:bg  
CDs 2, 3, 7, 12

#050671

MAYOR WITH FILE

LOS ANGELES CITY COUNCIL  
**FINDINGS ADOPTED.**  
**NEG. DEC. ADOPTED**  
**TO THE MAYOR FOR REVIEW**

## RESOLUTION

A RESOLUTION OF THE APPLICATION BY THE  
CITY COUNCIL OF THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA,  
REQUESTING THE LOCAL AGENCY FORMATION COMMISSION OF THE COUNTY OF LOS ANGELES TO  
INITIATE PROCEEDINGS TO ADOPT AN AMENDED SPHERE OF INFLUENCE FOR, AND AS PROPOSED BY,  
THE CITY OF LOS ANGELES.

WHEREAS, the City of Los Angeles desires to initiate proceedings pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, Division 3, commencing with Section 56000 of the California Government Code;

WHEREAS, this proposal is consistent with the spirit and intent of the California Government Code commencing with Section 56425;

WHEREAS, the territory proposed to be included in this sphere of influence is set forth in Exhibit "A", attached hereto and by this reference incorporated;

WHEREAS, the City has prepared and adopted a comprehensive general plan for the City;

WHEREAS, the City Council of the City of Los Angeles conducted a public meeting on May 4, 2005 pursuant to applicable law, to consider the proposed sphere of influence;

WHEREAS, the reasons for this proposed sphere of influence are as follows:

3. Facilitate orderly growth in the unincorporated areas adjacent to the City of Los Angeles;
4. Coordinate property development standards and encourage timely provision of adequate and essential services such as streets, sewer, water, police and fire protection, parks and recreation, flood control, and solid waste disposal, as urbanization of unincorporated areas occurs;
5. Promote cooperative planning between the City of Los Angeles and the County of Los Angeles, various public/private service entities, and major landowners, and so facilitate proper implementation of their respective general or master plans;
6. Assist all government agencies and private entities in planning and scheduling the logical, orderly, and economic extension of their facilities and services, thus avoiding expensive and unnecessary duplication of effort;
7. Promote, assist, and enhance property owners' ability to plan comprehensively, and with reasonable assurance, for the ultimate use and development of their lands; and

WHEREAS, the City Council of the City of Los Angeles, California, has considered all evidence, oral and documentary, and is advised in the premises;

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Los Angeles, California, does hereby determine and find as follows:

Section 1. This resolution is hereby adopted and approved by the City Council, and the Local Agency Formation Commission of the County of Los Angeles is hereby requested to initiate proceedings to adopt an amended sphere of influence as mapped in Exhibit "A", which is incorporated herein by this reference, according to the terms and conditions stated above, and in the manner provided by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

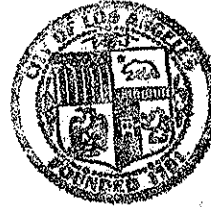
Section 2. The City Council hereby directs and authorizes the City Clerk of the City of Los Angeles to file a certified copy of this resolution with the Executive Officer of the Local Agency Formation Commission of the County of Los Angeles.

Section 3. The City Clerk shall certify the adoption of this resolution.

PASSED, APPROVED, AND ADOPTED this 10<sup>th</sup> day of MAY, 2005.

ATTEST:

Frank T. Martinez  
Frank T. Martinez, City Clerk



STATE OF CALIFORNIA       )  
COUNTY OF LOS ANGELES   )  
CITY OF LOS ANGELES       )

I, Frank T. Martinez, City Clerk of the City of Los Angeles, do hereby certify that the foregoing Resolution was duly adopted by the City Council of the City of Los Angeles.

COUNCIL VOTE

May 10, 2005 10:36:52 AM, #1

Items for Which Public Hearings Have Been Held - Items 12-43

Voting on Item(s): 15-16,20,22-35,37-40,43

Roll Call

|              |        |
|--------------|--------|
| CARDENAS     | Absent |
| GARCETTI     | Yes    |
| GREUEL       | Yes    |
| HAHN         | Yes    |
| LABONGE      | Yes    |
| LUDLOW       | Absent |
| MISCIKOWSKI  | Yes    |
| PARKS        | Absent |
| PERRY        | Yes    |
| REYES        | Yes    |
| SMITH        | Yes    |
| VILLARAIGOSA | Absent |
| WEISS        | Yes    |
| ZINE         | Yes    |
| *PADILLA     | Yes    |

Present: 11, Yes: 11 No: 0

PLANNING AND LAND USE MANAGEMENT COMMITTEE  
SUGGESTED NOTIFICATION OF COUNCIL ACTION

Council File No. 05-0671

sign

Applicant/Appellant/Owner

Representative

See attached

- ☒ Council Member(s) 2, 3, 7, 12
- ☒ Office of the Mayor (w/file) - Section \_\_\_\_\_
- ☐ City Attorney (w/blue slip) - Attn: \_\_\_\_\_
- ☒ City Administrative Officer (CAO)
- ☒ Chief Legislative Analyst (CLA)
- ☒ City Planning Department - Attn: Den Scott; Susan Whit
- ☐ City Planning Commission - Attn: Gabriele Williams (w/copy of Ordinance)  
(ZC; HD; BL; HE; HPOZ; GPA; SPE; CPU; CPR; CA; ICO; TOD; SP; CDO)
- ☒ Director of Planning (same as Commission)
- ☐ Office of Zoning Administration - (all ZA cases; CU; ZV)
- ☐ Advisory Agency - (PM; TT; CPU; CPR; CA; ICO; TOD; SP; CDO)
- ☒ Community Planning Section - (DRB; CPU; CPR; CPE; TT; PM; CA; ICO; CDO; HE)
- ☒ Geographic Information Section - Attn: Fae Tsukamoto - (same as Commission)
- ☒ Information Technology Agency - (large projects)
- ☒ Bureau of Engineering, Land Development & Mapping Division - (generally most cases)
- ☒ Department of Transportation, Traffic/Planning Sections - (generally most cases)
- ☒ Department of Building & Safety c/o Zoning Coordinator - (generally most cases)
- ☒ Residential Inspection Unit - Mail Stop 115 - (SPE; HE; CU; ICO; ZC; generally most cases)
- ☒ Bureau of Street Lighting, "B" Permit Section - (all zoning cases)
- ☒ Department of Water and Power - (DB & large projects)
- ☐ Fire Department - (all zoning & hillside cases)
- ☐ Police Department - (beer & wine; adult entertainment, revocations)
- ☐ Community Development Department
- ☒ Los Angeles County Assessor - (CU appeals & large projects)
- ☒ LAFCD

DEPARTMENT OF  
CITY PLANNING  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801  
AND  
6262 VAN NUYS BLVD., SUITE 351  
VAN NUYS, CA 91401  
CITY PLANNING COMMISSION

MABEL CHANG  
PRESIDENT  
DAVID L. BURG  
VICE-PRESIDENT  
JOY ATKINSON  
ERNESTO CARDENAS  
SUSAN CLINE  
MARY GEORGE  
MICHAEL MAHDESIAN  
BRADLEY MINDLIN  
THOMAS E. SCHIFF

GABRIELE WILLIAMS  
COMMISSION EXECUTIVE ASSISTANT  
(213) 978-1300

CITY OF LOS ANGELES  
CALIFORNIA



JAMES K. HAHN  
MAYOR

*Submitted*

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*Contra*  
*5-4-05*  
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*replace*  
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DATE: April 6, 2005

TO: Honorable Ed Reyes  
Planning and Land Use Management Committee  
Los Angeles City Council

FROM: Con Howe *[Signature]*  
Director of Planning  
Los Angeles Department of City Planning

SUBJECT: Amendment to the Boundaries of the Sphere of Influence  
CF-00-2206

### BACKGROUND

On November 14, 2000, the City Council adopted a Motion (Bernson-Galanter, CF 00-2206) instructing the City Planning Department, with assistance from the Chief Legislative Analyst, to prepare an application to the Local Agency Formation Commission of the County of Los Angeles to amend the boundaries of the sphere of influence for the City of Los Angeles pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. The sphere of influence is the geographic area in Los Angeles County that is determined to be the probable, ultimate physical boundaries and service area for the City of Los Angeles. The current boundary of the sphere for the City of Los Angeles is coterminous with the incorporation limits, as shown on Exhibit A.

### BOUNDARY RECOMMENDATION

The requested northern boundary of the proposed sphere of influence amendment follows the natural ridgeline of the San Gabriel and Santa Susana Mountains. Staff recommends that the boundary of the sphere be expanded to include the areas near Dayton Canyon between the Ventura County Line and the City of Los Angeles on the west, north along the Ventura County line to the ridgeline of the Santa Susanna



Mountains, turning east following the ridgeline of the Santa Susana Mountains (west of the 405 Freeway) to the limits of the City of Santa Clarita at the Sierra Highway. The boundary then follows the limits to the south and then east, and continues to follow the ridge line eastward to the boundary of the Angeles National Forest before turning southward following the boundary of the National Forest and the unincorporated areas to a terminus south of Little Tujunga Road. In some areas, these proposed boundaries follow the current boundary with deviations to include unincorporated areas between the City of Los Angeles and Ventura County and between the City of Los Angeles and the Angeles National Forest. Along the northern segment, the border was chosen to include unincorporated areas in the San Fernando Valley that are south of the natural ridgeline of the Santa Susana Mountains as shown on Exhibits A and B. Slight modifications were made to account for ownership of parcels. The ridgeline separates the San Fernando Valley from the Santa Clarita Valley and defines the northern edge of the drainage basin for the San Fernando Valley. Water flowing from the southern face of the ridge feeds the Los Angeles River and the valley aquifer. Municipal services that are gravity driven such as sewer service can be provided more efficiently by the local agency located downward from the ridge.

Portions of the Los Angeles River watershed that are in the proposed sphere of influence help mitigate flooding, maintain water quality and quantity, recycle nutrients, and provide an important habitat for plants and animals. The City Council established the Los Angeles Ad Hoc River Committee in June 2002 to focus on major revitalization efforts for the Los Angeles River including opportunities for parks, trails, recreation, nature, neighborhood identity, jobs, community development, tourism, and civic pride. One of the guiding principles for the Los Angeles River is viewing the river as an important natural resource with emphasis on the ecology of the river, flood management, and sustainability. Encompassing the watershed for the Los Angeles River in the sphere of influence for the City of Los Angeles is both logical and paramount to the continued success of revitalization efforts.

The Los Angeles River watershed is an important boundary on which to base the sphere of influence as it directly impacts the delivery of a wide range of services related to stormwater and water quality. Rain that falls within the unincorporated portions of the Los Angeles River watershed eventually passes through the City of Los Angeles. Any activities that generate water-borne pollutants regulated by the State will affect the City. The City of Los Angeles settled two lawsuits, in 2002 and 2003, related to State requirements concerning TMDL requirements in stormwater flows. Voters in 2004 passed a \$500 million bond to address stormwater needs and general environmental enhancements. Providing the City a sphere of influence over this area improves the City's ability to provide stormwater management services to the area and ensures more efficient, direct management responsibility for any pollutants that occur throughout the Los Angeles River watershed because there would be fewer governmental agencies with responsibility for that area.

### **DESCRIPTION OF PROPOSED AMENDMENT AREA**

The proposed amendment area for the City's sphere of influence covers 19,242 acres, or slightly more than 30 square miles. Major ridgelines of the transverse Santa Susana Mountain Range are to the north and west, and metropolitan communities of the

Los Angeles Basin are to the south. Portions of Ventura County adjacent to the amendment area contain parklands, agricultural land uses and scattered single-family residences. Sunshine Canyon Landfill is adjacent to the area on the north. The project area is contiguous to portions of Council Districts 3, 12, 7 and 2 and community plan areas of Canoga Park – Winnetka - Woodland Hills - West Hills, Chatsworth - Porter Ranch, Granada Hills – Knollwood, Northridge, Sylmar, and Sunland - Tujunga - Shadow Hills - Lakeview Terrace - East La Tuna Canyon.

The land uses in the northern San Fernando Valley within the City of Los Angeles are classified mainly as Open Space or Minimum Residential with some Very Low and Low density Residential in the Porter Ranch area, as shown on Exhibit C. The land in the proposed amended area is designated by the County General Plan primarily as Non-Urban and Open Space. There are rural communities near Little Tujunga Road, and north of the 118 near the current western city border. Deerlake development has been approved north of the rural community of Twin Lakes. A small acreage of commercial and industrial developments exist at intersection of Interstate 210 and State Highway 118. Major arterial roads in the proposed amendment area include Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road. Metrolink runs through the proposed area between Interstate 5 and State Highway 14.

Mountain ridges of varying heights, canyons, and flat land define the topography of the proposed amendment area. It is largely undeveloped land and is within the Santa Monica Mountains Conservancy Zone–Rim of the Valley Trail Corridor, a system of natural lands that shelters wildlife and extends recreational opportunities in the San Fernando and San Gabriel Valley areas, as shown on Exhibit D. The northwestern portion of the proposed sphere of influence contains a Significant Ecological Area (SEA) as defined and delineated in conjunction with the Land Use and Open Space Elements of the County General Plan.

Major tributaries for the Los Angeles River originate on the southern slopes of the Santa Susana Mountains within the proposed sphere of influence for the City of Los Angeles. These include the Santa Susana Wash, Browns Canyon Wash, Limekiln Canyon Wash, Wilbur Creek, Aliso Canyon Wash, and Bull Creek. The headwaters of the Los Angeles River are in the Simi Hills, formed by Chatsworth Creek, Dayton Canyon Wash, Bell Creek and Calabasas. These tributaries provide an important habitat for plants and animals.

Recreation areas containing hiking, biking and equestrian trails are adjacent to and within the proposed amendment area. Parks include: Bell Canyon Park, Knapp Park, Roscoe-Valley Circle Park, Chatsworth Nature Preserve/Reservoir, Chatsworth Oaks Park, Rocky Peak Park, Michael D. Antonovich Regional Park at Joughin Ranch, Brown's Canyon Park, Moonshine Canyon Park, Limekiln Canyon Park, Porter Ridge Park, O'Melveny Park, Santa Clarita Woodlands Park, Stetson and Wilson Canyon debris basins, Wilson Canyon Park, and Veterans Memorial County Park. The Angeles National Forest is north of the proposed sphere east of the 405 freeway.



## **PURPOSE OF THE SPHERE OF INFLUENCE**

A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In general, the purpose of a sphere of influence is to:

1. Facilitate orderly growth in the unincorporated areas adjacent to a city;
2. Coordinate property development standards, and encourage timely provision of adequate and essential services, such as parks, recreation, and flood control and, if urbanization of unincorporated areas occurs, streets, sewer, water, solid waste disposal, and police and fire protection;
3. Promote cooperative planning between the city and county, various public/private service entities, major landowners, and facilitate proper implementation of their respective general or master plans;
4. Assist all government agencies and private entities in any planning and scheduling for extension of their facilities and services to assure it will be done in a logical, orderly, and economical manner, thus avoiding expensive and unnecessary duplication of effort; and
5. Promote, assist, and enhance property owners' ability to plan comprehensively, and with reasonable assurance for the ultimate use and development of their lands.

## **IMPACT OF THE SPHERE AMENDMENT**

Historically, the City of Los Angeles has provided services to the proposed amendment areas. The ridgeline of the Santa Susana Mountains and the Angeles National Forest provide natural dividing lines between Los Angeles and the jurisdictions to the north. The City has an extensive network of police, fire, sanitation, and other services in operation adjacent to these areas and logically would provide the most effective service. The Los Angeles Police Department provides police service, and the Los Angeles City Fire Department provides fire and paramedic service within the municipal boundaries and also serve the surrounding unincorporated area of Los Angeles.

An expansion of the City's sphere of influence would formalize a procedure for the County to refer proposed actions and proposals for unincorporated areas to the City for review and comment. It is imperative that the City have a role in any proposals for development of upstream areas since increased urbanization would tax the carrying capacity of the Los Angeles River by decreasing permeable area, resulting in a rise in inflow peaks and volumes into the river. Several of the tributaries that are in the sphere amendment area are currently classified in the 500 year flood plain. The City has a need to assure adequate flood protection, reduce the velocity of storm water and runoff, and keep stormwater pollution levels below the total maximum daily loads.

An amended sphere of influence would allow the City of Los Angeles review authority for projects located inside Los Angeles County, outside of the City Limits, but within the

sphere area. Even though procedures for interagency referrals would change, the existing jurisdictional authority for projects within the unincorporated area would remain with the County of Los Angeles. No environmental plans or policies will be altered due to modifications of the City's sphere of influence boundary, nor will changes occur to jurisdictional authorities. An Initial Study was prepared and it was determined that amending the sphere of influence would have no environmental impacts. A Negative Declaration was published for the amendment to the sphere of influence and is included as Exhibit E.

Amending the boundary for the sphere of influence will have no effect on development—it will be neither easier nor harder. The primary effect of the boundary change will be to establish which government entity is the logical service provider. Becoming part of the sphere of influence does not change any processes or procedures. Any impact would come if an area is annexed, which can be requested without the amended sphere. Currently, unincorporated areas are governed by Los Angeles County; if annexed to the City of Los Angeles, they would be governed by the regulations and processes of the City. Any territories to be annexed would be pre-zoned. In the pre-zoning process, the City is required to comply with the California Environmental Quality Act and follow the same procedures and allow the same public comment as for a change in zone.

Although an expanded sphere of influence would facilitate processing requests for annexation from property owners and residents of inhabited areas, modification to a sphere of influence is not an annexation, nor does modification to an adopted sphere initiate annexation proceedings. No changes to jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use would ensue as a result of adopting a sphere of influence. The proposed area to be included in the amended sphere of influence of the City of Los Angeles will remain as part of the unincorporated portion of the County of Los Angeles. Future uses must be consistent with the General Plan and Zoning of Los Angeles County. A requirement of Government code Section 56425 is that any land included within the sphere of influence of the City of Los Angeles must be consistent with all parts of the General Plan for Los Angeles. No one part takes precedence. Land Use designations and zoning for the City of Los Angeles are assigned if and when the land in the sphere is annexed.

Because no development is being proposed as part of this project, the modifications to the City of Los Angeles's existing sphere of influence boundary will not result in a direct impact upon open space. Parks and recreation services provided within the amended sphere area would remain under the direct influence of the County of Los Angeles. The proposal will therefore not result in an impact to the quantity of existing recreation opportunities currently provided throughout the San Fernando Valley. Decisions on development or providing open space will depend on ownership of the land and the desires of the owner within established regulatory requirements.

## **ROLE OF LAFCOs**

LAFCOs exercise both regulatory and planning functions. They are responsible for annexations and detachments of territory to and/or from cities and special districts, incorporations of new cities, formations of new special districts, and consolidations, mergers, and dissolutions of existing districts. In addition, LAFCOs must review and approve contractual service agreements, determine spheres of influence for each city and district, and may initiate proposals involving district consolidation, dissolution, establishment of subsidiary districts, mergers, and reorganizations (combinations of these jurisdictional changes).

The major planning task of LAFCOs is the establishment of a sphere of influence for each local agency in its jurisdiction. Prior to 2000, the State of California approved the formation of many new local government agencies, often with little forethought as to the ultimate governance structures in a given region. Lack of coordination and adequate planning led to a multitude of overlapping, inefficient jurisdictional and service boundaries, and to the premature conversion/loss of California's agricultural and open-space lands. The Cortese-Knox-Hertzberg Act established Local Agency Formation Commissions as the regulatory agencies with countywide jurisdiction. Their purpose was to discourage urban sprawl, while encouraging orderly and efficient provision of services such as water, sewer and fire protection.

In considering an application to amend a local agency Sphere of Influence, LAFCOs must consider and make written determinations with regard to the following factors:

1. The present and planned land uses in the area, including agricultural and open space lands;
2. The present and probable need for public facilities and adequacy of public facilities and services in the area;
3. The present capacity of public facilities and adequacy of services that the agency provides or is authorized to provide; and
4. The existence of any social or economic communities of interest in the area, if the commission determines that they are relevant to the agency.

Upon adoption, LAFCOs use a sphere of influence as a factor in making determinations and decisions for proposals concerning cities or special districts and adjacent territories over which LAFCO has authority and jurisdiction. LAFCOs coordinate the orderly development of a community by reconciling the differences between city and county plans so that the most efficient urban service arrangements are created for the benefit of area residents and property owners.

LAFCO requires consistency with city general plans in adopting or amending a sphere of influence. The Commission, when establishing spheres of influence, considers joint City/County Specific Plans and factors such as density policies, development standards, geology, and future use. LAFCO also considers fiscal impacts of proposed sphere amendments. LAFCO has sole responsibility for establishing a city's sphere of influence. Further, LAFCO is not required to establish a sphere that is greater than the

city's existing boundaries. Spheres of influence for cities and special districts may overlap when both agencies expect to provide service to the area.

### **RECOMMENDATION**

The Los Angeles Department of City Planning recommends that the City request an amendment to the boundaries of the sphere of influence for the City of Los Angeles as shown on Exhibit A attached hereto. Accordingly, it recommends that the City Council approve the application to the Local Agency Formation Commission of the County of Los Angeles to amend the sphere of influence pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, included as Exhibit F and adopt the Resolution included as Exhibit G.

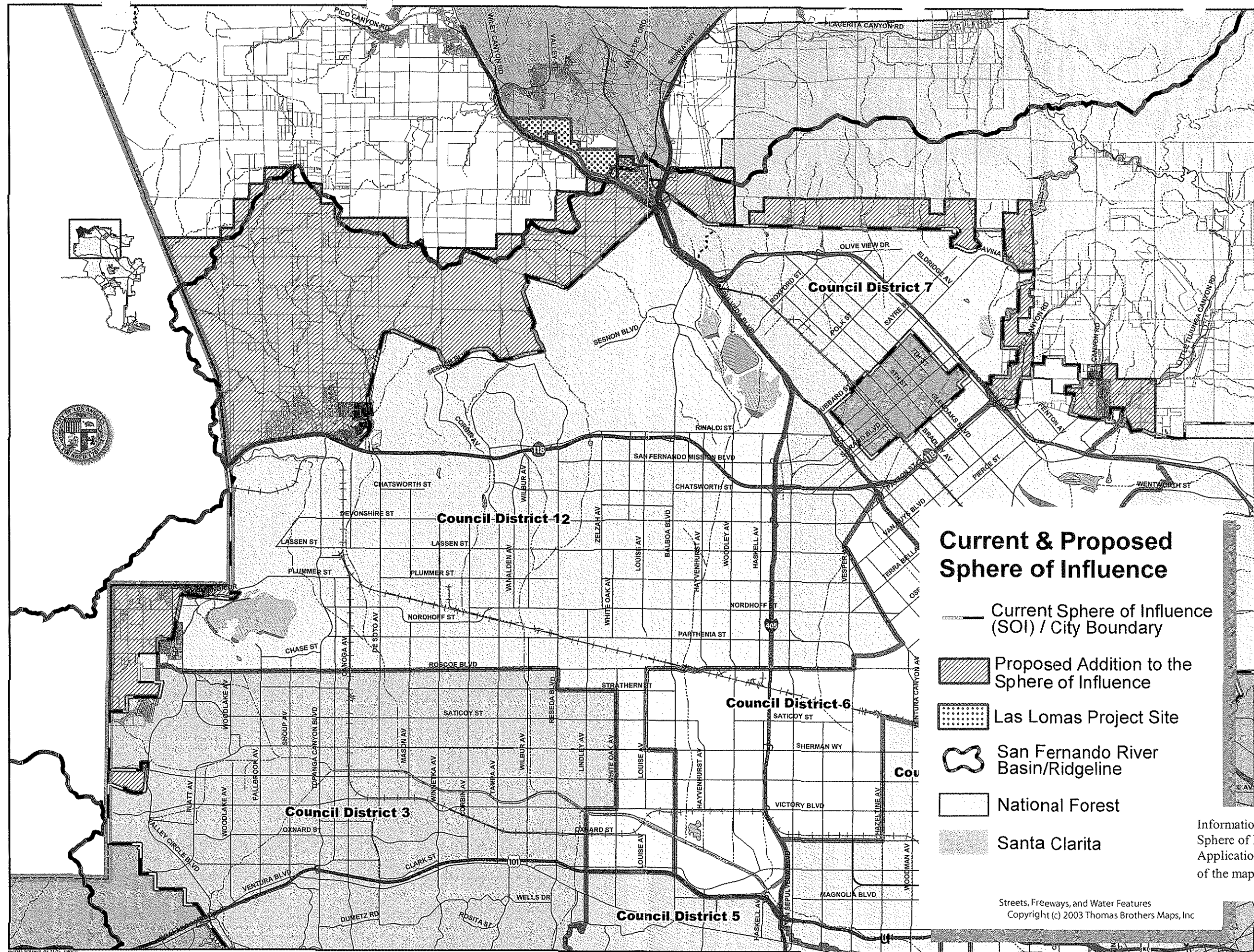
cc: Honorable Wendy Greuel, Council District 2  
Honorable Dennis Zine, Council District 3  
Honorable Jack Weiss, Council District 5  
Honorable Tony Cardenas, Council District 6  
Honorable Alex Padilla, Council District 7  
Honorable Cindy Miscikowski, Council District 11  
Honorable Greig Smith, Council District 12  
Mr. John Wickham, Office of the Chief Legislative Analyst

### **Exhibits**

- A. Informational Map of Current and Proposed Sphere of Influence
- B. Map of LA River and Major Tributaries
- C. Map of San Fernando Valley General Land Use and County Land Use
- D. Map of the Rim of the Valley Corridor
- E. Negative Declaration, Initial Study, Addendum and Letters
- F. Sphere of Influence Amendment Application with Official Map
- G. Resolution to Initiate Proceedings to Adopt an Amended Sphere of Influence with Official Map of Current and Proposed Sphere of Influence
- H. Additional Information Relating to Environmental Clearance and Finding
- I.. Sphere of Influence Motion CF 00-2206

**Exhibit A: Informational Map of Current and  
Proposed Sphere of Influence**

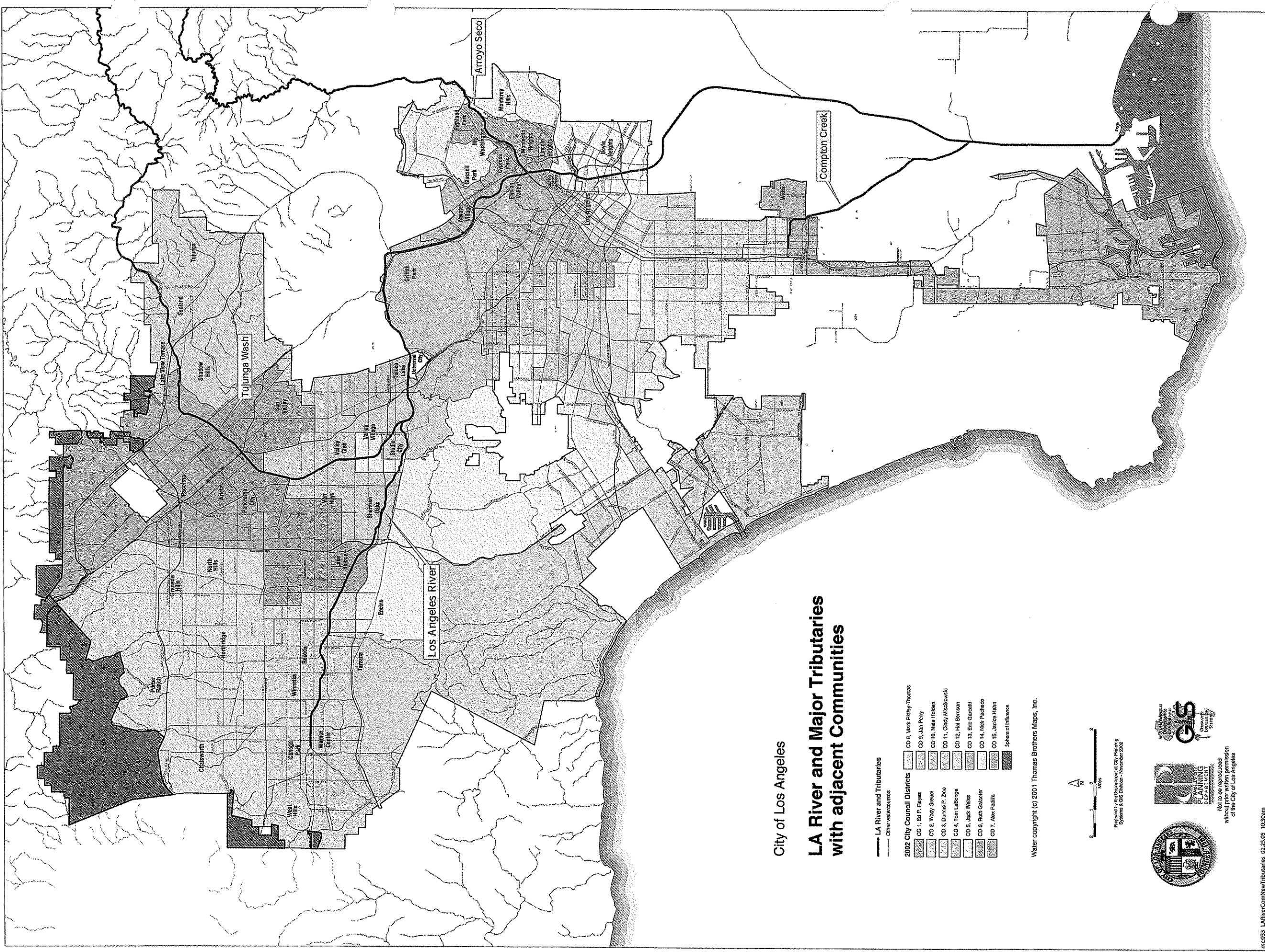
**(Note: See Exhibit F. Application and Exhibit G. Resolution,  
for the Official Map)**



Informational map only –see Exhibit F,  
Sphere of Influence Amendment  
Application for a copy  
of the map to be submitted to LAFCO..

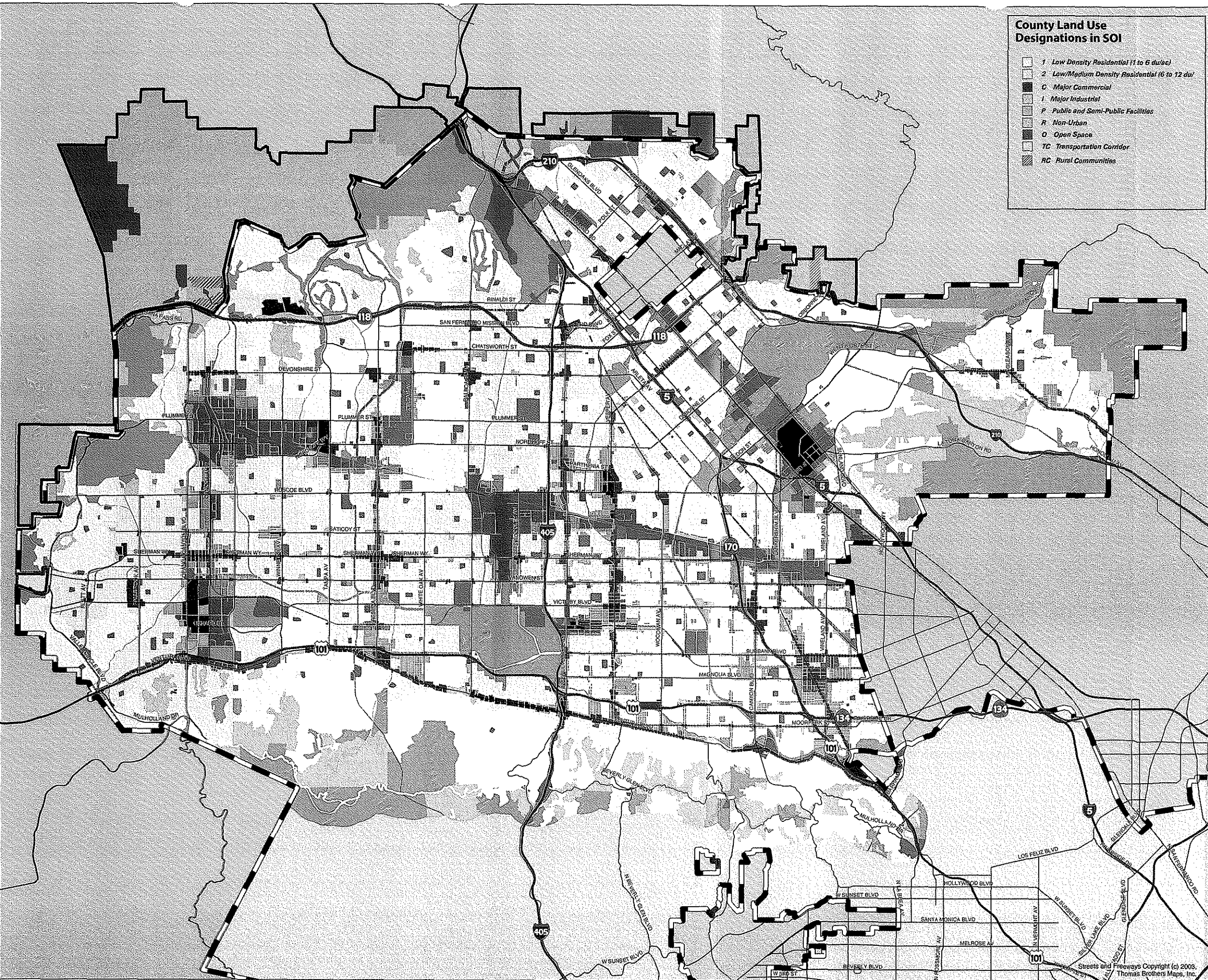
## **Exhibit B: Map of LA River and Major Tributaries**





**Exhibit C: Map of San Fernando Valley General Land Use  
and  
County Land Use**





**County Land Use Designations in SOI**

- 1 Low Density Residential (1 to 6 du/ac)
- 2 Low/Medium Density Residential (6 to 12 du/ac)
- C Major Commercial
- I Major Industrial
- P Public and Semi-Public Facilities
- R Non-Urban
- O Open Space
- TC Transportation Corridor
- RC Rural Communities

**City of Los Angeles**  
**San Fernando Valley**  
**General Plan Land Use**

**Residential**

- Minimum
- Very Low Density
- Very Low I
- Very Low II
- Low Density
- Low I
- Low II
- Low Medium Density
- Low Medium I
- Low medium II
- Medium Density
- High Medium Density
- High Density
- Very High Density

**Commercial**

- Neighborhood Commercial
- Limited Commercial
- General Commercial
- Community Commercial
- Regional Commercial

**Industrial**

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Parking

**Open Space, Public Facilities**

- Open Space
- Public Facilities

City Boundary (PLN)

Proposed Addition to Sphere of Influence



Prepared by the Department of City Planning  
 Systems & GIS Division - September 2004

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 of the City of Los Angeles

**Exhibit C**

**Exhibit D: Map of the Rim of the Valley Corridor**



# Parklands and Open Space




**SANTA MONICA MOUNTAINS CONSERVANCY ZONE - RIM OF THE VALLEY CORRIDOR**

Amendment to the SOI

**Exhibit E: Negative Declaration, Initial Study, Addendum and Letters**

**CITY OF LOS ANGELES**  
OFFICE OF THE CITY CLERK  
ROOM 395, CITY HALL  
LOS ANGELES, CALIFORNIA 90012  
**CALIFORNIA ENVIRONMENTAL QUALITY ACT**

PROPOSED **NEGATIVE DECLARATION**  
(Article V— City CEQA Guidelines)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                             |                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| <b>LEAD AGENCY</b><br>LOS ANGELES CITY PLANNING DEPARTMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                             | <b>COUNCIL DISTRICTS</b><br>CD 12, CD 7, and CD 2 |
| <b>PROJECT TITLE</b><br>Change of Organization or reorganization pursuant to the Cortese-Knox-Hertzberg Local Reorganization Act of 2000 (Title 5, Division 3, commencing with Section 56000 of the California government Code) relative to an amendment to boundaries of the Sphere of Influence for the City of Los Angeles.<br>"Sphere of Influence per CF-00-2206"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                             | <b>CASE #</b><br>ENV-2004-7108-ND<br>CF-00-2206   |
| <b>PROJECT LOCATION</b><br>The proposed Sphere of Influence amendment area is located in north Los Angeles County, outside the existing limits of the City of Los Angeles. The general boundaries of the sphere are west to east, unincorporated areas near Dayton Canyon northward along the Ventura County line to the ridge line of the Santa Susanna Mountains, turning eastwardly along the ridge line of the Santa Susanna Mountains to the limits of the City of Santa Clarita at the Sierra Highway, and following the limits to the south and then east, and continuing to follow the ridge line eastward to and along the boundary of the Angeles National Forest, and turning southward to a terminus south of Little Tujunga Road. The project area is served by Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road. Undeveloped National Forest lands lie to the east of the proposed sphere boundary. To the south is the City of Los Angeles, whose northern boundary is developed primarily with single family residential dwellings to the west of Interstate 5, and light industrial development to the east. West of the proposed project area is the County of Ventura, developed with agricultural uses and scattered single family dwelling units. To the northwest of the project area are the undeveloped Santa Susanna Mountains that separate the San Fernando and Simi Valleys. |                                                                                                                                                             |                                                   |
| <b>PROJECT DESCRIPTION</b><br>The project is a plan for modification to the adopted sphere in order to establish the probable ultimate physical boundaries and urban service area of the City of Los Angeles. The plan reflects the most efficient provision of future services including police, fire and utilities, and establishes who would have responsibility to provide such services. It is not an annexation nor initiation of annexation proceedings and does not change jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use. The proposed project covers 19,242 acres, or slightly more than 30 square miles.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                             |                                                   |
| <b>NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                             |                                                   |
| <b>FINDING:</b><br><br>The City Planning Department of the City of Los Angeles has proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                             |                                                   |
| SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                             |                                                   |
| Any written comments received during the public review period are attached together with the responses of the Lead City Agency. The project decisionmaker may adopt this mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                             |                                                   |
| <b>THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                             |                                                   |
| <b>NAME OF PERSON PREPARING THIS FORM</b><br>M. Susan Whisnant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>TITLE</b><br>Planning Assistant                                                                                                                          | <b>TELEPHONE NUMBER</b><br>(818) 374-5044         |
| <b>ADDRESS</b><br>Los Angeles Department of City Planning<br>6262 Van Nuys Boulevard, Room 351<br>Van Nuys, CA 90401                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>SIGNATURE (Official)</b><br>Daniel M. Scott, Senior City Planner<br> | <b>DATE</b><br>November 18, 2004                  |

**Exhibit E**

Amendment to the SOI

**CITY OF LOS ANGELES**

OFFICE OF THE CITY CLERK  
ROOM 615, CITY HALL  
LOS ANGELES, CALIFORNIA 90012

**CALIFORNIA ENVIRONMENTAL QUALITY ACT**

**INITIAL STUDY  
AND CHECKLIST**  
(Article IV – City CEQA Guidelines)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                                                                                                                                                                                             |                                                                                                                      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| <b>LEAD CITY AGENCY</b><br>Los Angeles Department of City Planning                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  | <b>COUNCIL DISTRICTS</b><br>CD 12, CD 7, and CD 2                                                                                                                                                           | <b>DATE</b><br>November 18, 2004                                                                                     |
| <b>RESPONSIBLE AGENCIES</b><br>Los Angeles County Local Agency Formation Commission (LAFCO)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |                                                                                                                                                                                                             |                                                                                                                      |
| <b>PROJECT TITLE/NO.</b><br>Change of Organization or reorganization pursuant to the Cortese-Knox-Hertzberg Local Reorganization Act of 2000 (Title 5, Division 3, commencing with Section 56000 of the California government Code) relative to an amendment to boundaries of the Sphere of Influence for the City of Los Angeles.<br>Sphere of Influence per CF-00-2206                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  | <b>CASE NO.</b><br>ENV-2004-7108-ND<br>CF-00-2206                                                                                                                                                           |                                                                                                                      |
| <b>PREVIOUS ACTIONS CASE NO.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  | <input checked="" type="checkbox"/> <b>DOES have significant changes from previous actions.</b><br><input type="checkbox"/> <b>DOES NOT have significant changes from previous actions.</b>                 |                                                                                                                      |
| <b>PROJECT DESCRIPTION:</b><br>The project is a plan for modification to the adopted sphere in order to establish the probable ultimate physical boundaries and urban service area of the City of Los Angeles. The plan reflects the most efficient provision of future services including police, fire and utilities, and establishes who would have responsibility to provide such services. It is not an annexation nor initiation of annexation proceedings and does not change jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use. The proposed project covers 19,242 acres, or slightly more than 30 square miles.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |                                                                                                                                                                                                             |                                                                                                                      |
| <b>ENVIRONMENTAL SETTING:</b><br>The project area is comprised of mountain ridges of varying heights, canyons and flat land. It is open space developed with approximately 740 single family dwelling units and multi-family dwellings that serve a population of approximately 1,550 persons including approximately 800 voters (according to the 2000 Los Angeles County Demographic prepared by the Los Angeles County Department of Regional Planning).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |                                                                                                                                                                                                             |                                                                                                                      |
| <b>PROJECT LOCATION</b><br>The proposed Sphere of Influence amendment area is located in north Los Angeles County, outside the existing limits of the City of Los Angeles. The general boundaries of the sphere are west to east, unincorporated areas near Dayton Canyon northward along the Ventura County line to the ridge line of the Santa Susanna Mountains, turning eastwardly along the ridge line of the Santa Susanna Mountains to the limits of the City of Santa Clarita at the Sierra Highway, and following the limits to the south and then east, and continuing to follow the ridge line eastward to and along the boundary of the Angeles National Forest, and turning southward to a terminus south of Little Tujunga Road. The project area is served by Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road. Undeveloped National Forest lands lie to the east of the proposed sphere boundary. To the south is the City of Los Angeles, whose northern boundary is developed primarily with single family residential dwellings to the west of Interstate 5, and light industrial development to the east. West of the proposed project area is the County of Ventura, developed with agricultural uses and scattered single family dwelling units. To the northwest of the project area are the undeveloped Santa Susanna Mountains that separate the San Fernando and Simi Valleys. |  |                                                                                                                                                                                                             |                                                                                                                      |
| <b>PLANNING DISTRICT</b><br>Chatsworth Porter Ranch, Northridge, Granada Hills-Knollwood, Sylmar, Sunland-Tujunga Lakeview Terrace- Shadow Hills-East La Tuna Canyon                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  | <b>STATUS:</b><br><input type="checkbox"/> <b>PRELIMINARY</b><br><input type="checkbox"/> <b>PROPOSED</b><br><input checked="" type="checkbox"/> <b>ADOPTED: 7/14/1993, 7/10/1996, 8/6/1987, 11/18/1997</b> |                                                                                                                      |
| <b>EXISTING ZONING</b><br>Land use designations would follow the County of Los Angeles General Plan as follows:: N1 (Non-urban 1), N2 (Non-urban 2: 0.5 to 1.0 dwelling units per acre), U1 (Urban 1: 1.1 to 3.3 dwelling units per acre), Urban 2 (Urban 2: 3.4 to 6.6 dwelling units per acre), U3 (Urban 3: 6.7 to 15.0 dwelling units per acre), U4 (Urban 4: 15.1 to 40 dwelling units per acre), C (Commercial), M (Industrial), RR (Resort recreational), W (Flood way and flood plains: Special Management Area, and S (Significant Ecological Area (SEA): Special Management Area).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  | <b>MAX. DENSITY ZONING</b><br>n/a                                                                                                                                                                           | <input type="checkbox"/> <b>DOES CONFORM TO PLAN</b><br><br><input type="checkbox"/> <b>DOES NOT CONFORM TO PLAN</b> |
| <b>PLANNED LAND USE &amp; ZONE</b><br>No change in land use and zoning.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  | <b>MAX. DENSITY PLAN</b><br>n/a                                                                                                                                                                             |                                                                                                                      |



## Amendment to the SOI

### SURROUNDING LAND USES

Undeveloped National Forest lands, single family residential dwellings, light industrial development, agricultural lands, Sunshine Canyon landfill.

### PROJECT DENSITY

n/a

■ NO DISTRICT PLAN

## DETERMINATION (To be completed by Lead Agency)

### On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Daniel M. Scott  
SIGNATURE

Senior City Planner  
TITLE

## EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:

#### Amendment to the SOI

- a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
  - 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
  - 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
  - 9) The explanation of each issue should identify:
    - a) The significance criteria or threshold, if any, used to evaluate each question; and
    - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

---

#### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |                                                 |                                                        |                                                             |
|-------------------------------------------------|--------------------------------------------------------|-------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics             | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Hydrology/Water Quality       | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Air Quality            | <input type="checkbox"/> Land Use/Planning             | <input type="checkbox"/> Transportation/Traffic             |
| <input type="checkbox"/> Biological Resources   | <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Utilities/Service Systems          |
| <input type="checkbox"/> Cultural Resources     | <input type="checkbox"/> Noise                         | <input type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Geology/Soils          | <input type="checkbox"/> Population/Housing            |                                                             |

---

#### INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

##### BACKGROUND

PROPONENT NAME  
City of Los Angeles

PHONE NUMBER  
(818) 374-5069

PROPONENT ADDRESS  
6262 Van Nuys Boulevard, Room 351  
Van Nuys, CA 91401-2709

AGENCY REQUIRING CHECKLIST  
Los Angeles Department of City Planning

DATE SUBMITTED  
November 18, 2004

PROPOSAL NAME (If Applicable)  
Sphere of Influence per CF-00-2206

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##### ENVIRONMENTAL IMPACTS

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

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## Amendment to the SOI

|  | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact |
|--|-----------------------------------|--------------------------------------------------------------|---------------------------------|-----------|
|--|-----------------------------------|--------------------------------------------------------------|---------------------------------|-----------|

### I. AESTHETICS. Would the project:

- |                                                                                                                                                                                                                                     |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista?                                                                                                                                                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Substantially degrade the existing visual character or quality of the site and its surroundings?                                                                                                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?                                                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### II. AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

- |                                                                                                                                                                                                                                     |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?                                                                                                                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?                                                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### III. AIR QUALITY. The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:

- |                                                                                                                    |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

## Amendment to the SOI

|                                                                                                                                                                                                                                | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|--------------------------------------------------------|------------------------------|-------------------------------------|
| c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard? | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d. Expose sensitive receptors to substantial pollutant concentrations?                                                                                                                                                         | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| e. Create objectionable odors affecting a substantial number of people?                                                                                                                                                        | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

### IV. BIOLOGICAL RESOURCES. Would the project:

|                                                                                                                                                                                                                                                                                                              |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ?                                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?                                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?                                                                                                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### V. CULTURAL RESOURCES: Would the project:

|                                                                                                                   |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

## Amendment to the SOI

|                                                                                                                      | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------|--------------------------------|--------------------------------------------------------|------------------------------|-------------------------------------|
| b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5? | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?              | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d. Disturb any human remains, including those interred outside of formal cemeteries?                                 | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

### VI. GEOLOGY AND SOILS. Would the project:

a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving :

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii. Strong seismic ground shaking?

iii. Seismic-related ground failure, including liquefaction?

iv. Landslides?

b. Result in substantial soil erosion or the loss of topsoil?

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

|                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### VII. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials

|                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

## Amendment to the SOI

|                                                                                                                                                                                                                                                                  | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|--------------------------------------------------------|------------------------------|-------------------------------------|
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?                                                                  | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?                                                                                                  | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?                                   | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?                                                                                                          | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?                                                                                                                                        | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?                                             | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

### VIII. HYDROLOGY AND WATER QUALITY. Would the proposal result in:

|                                                                                                                                                                                                                                                                                                                                                                                      |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Violate any water quality standards or waste discharge requirements?                                                                                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?                                                                                                                                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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|                                                                                                                                                                                                                                                                            | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in an manner which would result in flooding on- or off site? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?                                                                                      | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. Otherwise substantially degrade water quality?                                                                                                                                                                                                                          | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?                                                                                                               | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| h. Place within a 100-year flood plain structures which would impede or redirect flood flows?                                                                                                                                                                              | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| i. Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?                                                                                                        | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| j. Inundation by seiche, tsunami, or mudflow?                                                                                                                                                                                                                              | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

### IX. LAND USE AND PLANNING. Would the project:

|                                                                                                                                                                                                                                                                                                 |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Physically divide an established community?                                                                                                                                                                                                                                                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan?                                                                                                                                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### X. MINERAL RESOURCES. Would the project:

|                                                                                                                                                                        |                          |                          |                          |                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

## Amendment to the SOI

### XI. NOISE. Would the project:

| Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact |
|-----------------------------------|--------------------------------------------------------------|---------------------------------|-----------|
|-----------------------------------|--------------------------------------------------------------|---------------------------------|-----------|

- |                                                                                                                                                                                                                                                                     |                          |                          |                          |                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?                                                                                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### XII. POPULATION AND HOUSING. Would the project:

- |                                                                                                                                                                                                          |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?                                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### XIII. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- |                       |                          |                          |                          |                                     |
|-----------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Fire protection?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



## Amendment to the SOI

|                                                   | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|---------------------------------------------------|--------------------------------|--------------------------------------------------------|------------------------------|-------------------------------------|
| c. Schools?                                       | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d. Parks?                                         | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| e. Other governmental services (including roads)? | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

### XIV. RECREATION.

|                                                                                                                                                                                                                |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### XV. TRANSPORTATION/CIRCULATION. Would the project:

|                                                                                                                                                                                                                                                                                        |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to ratio capacity on roads, or congestion at intersections)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?                                                                                                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?                                                                                                                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?                                                                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Result in inadequate emergency access?                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Result in inadequate parking capacity?                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?                                                                                                                                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

## Amendment to the SOI

### XVI. UTILITIES. Would the project:

|                                                                                                                                                                                                                                   | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?                                                                                                                               | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                            | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                                      | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?                                                                             | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?                                                                                                            | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| g. Comply with federal, state, and local statutes and regulations related to solid waste?                                                                                                                                         | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

### XVII. MANDATORY FINDINGS OF SIGNIFICANCE.

|                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Does the project have impacts which are individually limited, but cumulatively considerable?<br>("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).                                                                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?                                                                                                                                                                                                                                                                                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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**DISCUSSION OF THE ENVIRONMENTAL EVALUATION** (Attach additional sheets if necessary)

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The list of impact categories and subcategories were prepared pursuant to the public Resources Code and the California Environmental Quality Act (CEQA). [Please see the following sections of the Public Resources Code and CEQA Guidelines: Public Resources code section 21082.2 (Significant effect based on substantial evidence, not public controversy or speculation), CEQA sections 15063 (Initial Study), 15064 (Determining the Significance of Environmental Effects Caused by a Project), 15065 (Mandatory Findings of Significance), 15070 (Decision to Prepare a Negative or Mitigated Negative Declaration; ND/MND), 15071 (Contents {of ND/MND}) and 15047 (Consideration and Adoption of a Negative Declaration or Mitigated Negative Declaration)]

The Public Resources Code and CEQA Guidelines explicitly indicate "substantial evidence" as a basis for determining the significance of impacts on the environment caused by a Project. Public Resources code section 21082.2 (c) states - "argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." Public Resources Code section 21082.2 (b) states - "The existence of public controversy over the environmental effects of a project shall not require preparation of an environmental impact report if there is no substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment" (also see CEQA Guidelines sections 15382 and 15384).

Furthermore, the determination to prepare a Negative or Mitigated Negative Declaration (ND/MND) or an Environmental Impact Report (EIR) is reached by the examination of certain facts and supporting data, which clearly support the method of disclosure (i.e. ND/MND, EIR), alternatives, and mitigation of environmental impacts. The following criteria must be evident when an EIR is required by the Lead Agency (CITY OF LOS ANGELES) per CEQA Guidelines section 15065 (Mandatory Findings of Significance); a project will have a significant effect if it will:

- Substantially degrade environmental quality
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self-sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that will cause substantial adverse effects on human beings.

| PREPARED BY       | TITLE              | TELEPHONE #    | DATE          |
|-------------------|--------------------|----------------|---------------|
| M. Susan Whisnant | Planning Assistant | (818) 374-5044 | November 2004 |

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### **Addendum to ENV-2004-7108-ND**

In the Initial Study Checklist, Council Districts section, add CD 3.

In the Proposed Negative Declaration, Council Districts section, add CD 3.

In the proposed Negative Declaration, replace the language in the Findings section with the following language:

|                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>FINDING:</b></p> <p>The City Planning Department of the City of Los Angeles has proposed that a negative declaration be adopted for this project.</p> <p>Based upon the initial study, there is no substantial evidence that the project may have a significant effect on the environment.</p>                                                        |
| <p>Any written comments received during the public review period are attached together with the response of the Lead City Agency. The project decision-maker may adopt this negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.</p> |
| <p>THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.</p>                                                                                                                                                                                                                                                                                             |

#### **Evaluation of Environmental Impacts**

##### **I. Aesthetics**

A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. No annexation, development, or change of governance is proposed and there will be no impact on aesthetics including scenic vistas, scenic resources, the existing visual character or quality of the site and its surroundings and no new source of substantial light or glare which would adversely affect day or nighttime views in the area.

##### **II. Agricultural Resources**

A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and there will be no conversion of prime farmland, unique farmland, or farmland of statewide importance, and no changes in the existing environment.

##### **III. AIR QUALITY.**

A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and there will be no impact on air quality.

##### **IV. BIOLOGICAL RESOURCES.** A sphere of influence is a planning tool or guide for

the probable, ultimate physical boundary and municipal service area of a local governmental agency. The project proposes modification to an existing sphere of influence boundary for the City of Los Angeles, and does not propose development. Therefore, the proposal will not result in no impact to endangered, threatened or rare species or their habitats, including but not limited to plant, fish, insect, animal, and/or bird habitats. The proposal does not propose the removal of oak trees, will not affect any wetland habitat or blueline stream, and will not create negative impacts to wildlife dispersal or migration corridors.

V. CULTURAL RESOURCES. A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development, change of jurisdictional responsibilities, or management policies is proposed and there will be no impact on historical resources, archeological resources, paleontological resources, geologic features, or any disturbance of human remains.

VI. GEOLOGY AND SOILS. A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and there will be no exposure of people or structures to potential substantial adverse effects, no increase in soil erosion or loss of topsoil. Since the project is does not involve construction, location of the project is not relevant to environmental impacts.

VII. HAZARDS AND HAZARDOUS MATERIALS. A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and there will be no transport of materials or release of hazardous materials, no interference with an adopted emergency response plan or emergency evacuation plan, and no risk of loss, injury or death involving wildland fires.

VIII. HYDROLOGY AND WATER QUALITY. A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and there will be no wastewater discharge, no impact on groundwater, no alteration of drainage, and no creation of runoff.

IX. LAND USE AND PLANNING. A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and there will be no impact on land use and planning. The proposed area to be included in the amended sphere of influence of the City of Los Angeles will remain as part of the unincorporated portion of the County of Los Angeles. Future uses must be consistent with the General Plan and Zoning of Los Angeles County. A requirement of Government code Section 56425 is that any land included within the sphere of influence of the City of Los Angeles must be consistent with all parts of the General Plan for Los Angeles. No one part takes precedence. Land Use designations and zoning for the City of Los Angeles are assigned if and when the land in the sphere is annexed.

X. MINERAL RESOURCES. A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local

governmental agency. In amending the sphere of influence, no development is proposed and there will be no loss of mineral resources.

XI. NOISE. A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and there will be no creation of noise.

XII. POPULATION AND HOUSING. A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and there will be no impact on population growth or housing.

XIII. PUBLIC SERVICES. A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and there will be no impact on public service, no need for new or physically altered governmental facilities, construction of which could cause significant environmental impacts.

XIV. RECREATION. A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and there will be no impact on recreation. The proposed sphere of influence amendment will not result in changes to jurisdictional authority, and therefore the quantity of parks and recreation services provided within the amended sphere area would remain under the direct influence of the County of Los Angeles. The proposal will therefore not result in an impact to the quantity or quality of recreation opportunities.

XV. TRANSPORTATION/CIRCULATION. A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and there will be no resulting traffic, increase in hazards to a design feature, and no resulting inadequate emergency access.

XVI. UTILITIES. A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and there will be no wastewater, stormwater, or solid waste as a result of the project.

#### XVII. MANDATORY FINDINGS OF SIGNIFICANCE.

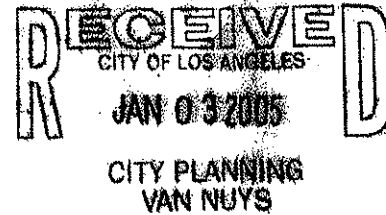
A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In amending the sphere of influence, no development is proposed and the project does not have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The project does not have impacts which are individually limited, but cumulatively considerable. The project has no

ENV-2004-7108-ND

environmental effects that cause substantial adverse effects on human beings, either directly or indirectly.

December 27, 2004

Susan Whisnant  
Los Angeles Department of City Planning  
6262 Van Nuys Boulevard, Room 351  
Van Nuys, CA 90401



RE : Proposed Negative Declaration: ENV-200 4-7 108 : CF -00-2206

Dear Ms. Whisnant:

On December 14, 2004 at a duly noticed joint meeting of the Neighborhood Council Planning and Land Use Committees of the Chatsworth, Granada Hills North, Porter Ranch and Neighborhood Councils from Council District 2 and 7 were invited to discuss the "Sphere of Influence" Negative Declaration 841-04-PL: ENV-2004-7108.

In attendance were appointed and elected representatives from Chatsworth Neighborhood Council, Foothill Trails District Neighborhood Council, Granada Hills North Neighborhood Council, Porter Ranch Neighborhood Council, Sunland Tujunga Neighborhood Council, Sylmar Neighborhood Council, and West Hills Neighborhood Council.

Mr. Platkin from City Planning presented the Los Angeles City Planning Department proposal to change the sphere of influence. He stated that some material regarding this proposal would not be available until January 2005. He was also unable to provide answers or respond to the following Committee Member questions and comments:

1. The time allowed for comment is very short and very little information is available on what this really means to residents of the City of Los Angeles.
2. How can the public make an informed analysis of this proposal, if certain documents are not being made available to the public until January 2005 and the comment period on this document expires December 27, 2004?
3. What parts of the General Plan for the City of Los Angeles will take precedence in determining the future uses of this area? They include conflicting statements, and clarity as to what will be done in this area is deserved and necessary. The County of Los Angeles has taken a clear stand in its update to their General Plan as to appropriate land uses in this area - what is the City proposing? Citizens deserve to know, that is the intent of public disclosure and notice, but NO INFORMATION HAS BEEN PROVIDED.
4. Does the public notice on the Negative Declaration need to be re-published, no address to send comments to was indicated; only an address for review of the file was indicated; shouldn't a comment address be included?



5. A checklist indicating "No Impact" to each question in the document does not provide the public with appropriate information on the results of the proposed sphere of influence
6. What documents are available for review? How can the public obtain them?  
We need these documents to determine the intent of the City about development in the area if a sphere of influence is adopted.
7. Why were these borders chosen?
8. Would the proposed sphere of influence make development in the project area easier?
9. If a future development project is proposed - what is different in the approval process for the project, comparing a project that is within a sphere of influence and a project that is outside any sphere of influence of the City of Los Angeles?
10. Will the primary effect of the proposed sphere of influence be to foster development or to provide for long-term open space?
11. How will this impact open space?
12. What provision is made in the proposed sphere of influence for open space?
13. Why are certain projects like Deerlake, Los Lomas, and Chatsworth Lake Manor included?
14. How will pending federal parkland proposals be incorporated in the sphere of influence plan for the area?
15. How will this impact the Rim of the Valley Trail and Park? i
16. Will this address the Federal plan for the Rim of The Valley Corridor study?
17. What impact will an adopted sphere of influence have on the wildlife corridor that is so important across the 405 freeway and across the northern mountain ranges, that forms the bridge between the Angeles National Forest and the Los Padres Forest?
18. How will the City utilize the SEA (significant ecological area) proposals issued by the County of Los Angeles, and the development standards set for the SEA's in the proposed sphere of influence?

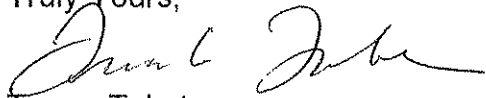
The representatives present at this meeting have agreed to jointly request that the time for comment be extended so that each representative can return to their respective neighborhood councils with the City's Sphere Of Influence proposal. We feel that the issuance of this comment period via public notice during the holiday season, beginning with the Thanksgiving Day publication for the comment period is inappropriate.

We feel that prior to this moving forward, Neighborhood Councils should have all the questions answered and all information not yet available (as stated by Mr. Platkin) so we can adequately review and comment. The proposed sphere of influence area comprises over 19,000 acres, 30 square miles per the Negative Declaration; a significant increase in land influenced by the City of Los Angeles by any means or method of counting. We want to provide an opportunity for public comment based on all documents (including those not yet provided,

documents necessary to understand the proposal such as a Specific Plan for the area, a financial study of the effect of the proposal, responses to the above questions, etc. is necessary).

Thank you for sending Mr. Platkin and we look forward to a response.

Truly Yours,

A handwritten signature in cursive script, appearing to read 'Teena Takata', written in dark ink.

Teena Takata

Recording Secretary

Land Use Committee, Chatsworth Neighborhood Council

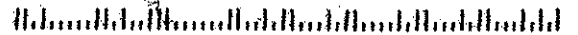
9629 Baden Avenue  
Chatsworth, CA 91311  
818 703-1040

Teena Takata  
9629 Baden Avenue  
Chatsworth CA 91311



Susan Whisnant  
Los Angeles Department of City Planning  
6262 Van Nuys Boulevard, Room 351  
Van Nuys, CA 90401

91401+2762



Responses to Questions from 12/14/2004 CNC's Meeting  
Mailed to Teena Tekata and CNC's

1. *How can the public make an informed analysis of this proposal, if certain documents are not being made available to the public until January 2005 and the comment period on this document expires December 27, 2004?*

The public is encouraged to continue to submit comments on the Negative Declaration. The comment period for the Negative Declaration was established according to our standard period for review following State of California law: In order to be responsive to requests for additional time, the comment period has been extended to January 10, 2005.

"15105. Public Review Period for a Draft EIR or a Proposed Negative Declaration or Mitigated Negative Declaration

(b) The public review period for a proposed negative declaration or mitigated negative declaration shall be not less than 20 days. When a proposed negative declaration or mitigated negative declaration is submitted to the State Clearinghouse for review by state agencies, the public review period shall not be less than 30 days, unless a shorter period, not less than 20 days, is approved by the State Clearinghouse."

Additional documents are not available for the Negative Declaration. The Neighborhood Council Planning and Land Use Committees of the Chatsworth, Granada Hills North, and Porter Ranch Neighborhood Councils will be included on the mailing list for the proposal.

2. *What parts of the General Plan for the City of Los Angeles will take precedence in determining the future uses of the area?*

The proposed area to be included in the amended sphere of influence of the City of Los Angeles will remain as part of the unincorporated portion of the County of Los Angeles. Future uses must be consistent with the General Plan and Zoning of Los Angeles County. A requirement of Government code Section 56425 is that any land included within the sphere of influence of the City of Los Angeles must be consistent with all parts of the General Plan for Los Angeles. No one part takes precedence. Land Use designations and zoning for the City of Los Angeles are assigned if and when the land in the sphere is annexed.

The City currently is not proposing to annex any of the area in the proposal and thus has not studied appropriate uses. The Local Agency Formation Commission for Los Angeles County ("LAFCO") pursuant to Section 56425 of the Government Code is required to make written determinations regarding the following for the adoption of, or amendment to a sphere of influence:

- 1) The present and planned land uses in the area, including agricultural and open space lands.

- 2) The present and probable need for public facilities and service in the area.
- 3) The present capacity of the public facilities and adequacy of public services, which the local agency provides or is authorized to provide.
- 4) The existence of any social or economic communities of interest in the area if the Commission determines they are relevant to the agency.

3. *What is the relationship of the Sphere of Influence and Las Lomas?*

There is no relationship between the current proposal and Las Lomas. The request is being made by the City of Los Angeles. Las Lomas is a separate, independent development project. The current proposal does include the southerly portion of the Las Lomas project that is within the San Fernando Valley watershed. The map presented at your meeting indicates the boundaries of the entire Las Lomas Project, but only the portion south of the ridge line is included in the sphere boundaries.

4. *What is the relationship of the Sphere and the lands controlled by the Santa Monica Conservancy and maintained by them as open space?*

An amendment of the Sphere of Influence would have no impact on the lands controlled by the Santa Monica Conservancy.

5. *Does the public notice on the Negative Declaration need to be republished, no address to send comments to was indicated; only an address for review of the file was indicated; shouldn't a comment address be included.*

The Negative Declaration does not need to be republished to include an additional address. The document provided a phone number for the City Planning Department and also an address in order to send comments.

6. *A checklist indicating "no Impact" to each question in the document does not provide the public with appropriate information on the results of the proposed sphere of influence.*

No annexation, development, or change of governance is proposed at this time. LAFCO must make findings listed in the response to question number 2.

7. *What documents are available for review? How can the public obtain them?*

The Staff Report will be available for review later in mid-January. The public can obtain them from Los Angeles Department of City Planning; attn: Susan Whisnant, Planning Assistant; 6262 Van Nuys Blvd., Van Nuys, CA 91401.

8. *Why were these borders chosen?*

The borders were chosen to include unincorporated areas in the San Fernando Valley that are

south of the natural ridge line of the Santa Susana mountains. Slight modifications take into account ownership of parcels that lie on both sides of the ridge. The areas to the east of the National Forest boundary consist of the county land currently located between the City of Los Angeles to the south and the National Forest to the north. Historically, the City of Los Angeles has provided services to these areas. The City has an extensive network of police, fire, sanitation, and other services in operation adjacent to these areas and logically would provide the most effective service to these areas. The ridge line defines the northern edge of the drainage basin for the San Fernando Valley. The water flows southerly from that ridge and feeds the Los Angeles River and the valley aquifer.

9. *Would the proposed sphere of influence make development in the project area easier?*

A proposal to amend the boundaries of the sphere of influence will have no effect on development; it will be neither easier nor harder. Becoming part of the sphere of influence does not change any processes or procedures. Any impact would come if an area is annexed, which can be requested without the amended sphere. Currently, unincorporated areas are governed by Los Angeles County; if annexed, they would be governed by the regulations and processes of the City of Los Angeles. LAFCO requires that a city pre-zone territories to be annexed. The pre-zoning process must comply with the California Environmental Quality Act and follow the same procedures as a change in zone.

10. *If a future development project is proposed—what is different in the approval process for the project, comparing a project that is within a sphere of influence and project that is outside any sphere of influence of the City of Los Angeles?*

See response to question 9.

The currently-existing jurisdictional authority for projects within the unincorporated area would remain with the County of Los Angeles. No environmental plans or policies will be altered due to modifications of the City's currently-existing sphere of influence boundary, nor will changes occur to jurisdictional authority. California Government Code Sections 65919-65919.12 regulate interagency referrals, and dictate that the planning review area for a city includes the area within the sphere of influence of that city. Therefore, an expansion to the City's sphere of influence area would formalize a procedure for referral by the County to the City of proposed actions, and for comment upon proposals, within the unincorporated area.

11. *Will the primary effect of the proposed sphere of influence be to foster development or to provide for long-term open space?*

The primary effect of the boundary change will be to establish which government entity is the logical service provider for the area. Decisions on development or providing open space will depend on ownership of the land and the desires of the owner within established regulatory requirements.

Because the project proposes modifications to the City of Los Angeles's existing sphere of influence boundary, and does not propose changes to general plan designations, zoning designations or land use, no changes to open space are anticipated.

12. *How will this impact open space?*

Because no development is being proposed as part of this project, the modifications to the City of Los Angeles's existing sphere of influence boundary will not result in an impact upon open space.

The proposed sphere of influence amendment will not result in changes to jurisdictional authority, and therefore the quantity of parks and recreation services provided within the amended sphere area would remain under the direct influence of the County of Los Angeles. The proposal will therefore not result in an impact to the quantity of existing recreation opportunities currently provided throughout the San Fernando Valley.

13. *What provision is made in the proposed sphere of influence for open space?*

Amending the sphere would not relate to provisions for open space or any other land uses.

The primary effect of the boundary change will be to establish which government entity is the logical service provider for the area. Decisions on development or providing open space will depend on ownership of the land and the desires of the owner within established regulatory requirements.

14. *Why are certain projects like Deerlake, Los Lomas, and Chatsworth Lake manor included?*

The boundaries of the proposed amended sphere were established to make a rational decision on which government entity is the logical service provider for the area. Any projects that exist in the amended boundary were included in the sphere. Only the portion of Los Lomas that is south of the ridge line is included in the proposed amended sphere.

15. *How will pending federal parkland proposals be incorporated in the sphere of influence plan for the area.*

The General Plan of Los Angeles County would continue to be the plan governing the unincorporated area if the proposed sphere is approved by LAFCO.

16. *How will this impact the Rim of the Valley Trail and Park?*

A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. The proposal to modify the boundary of the current sphere of influence for the City of Los Angeles will not impact the Rim of the Valley Trail and Park.

17. *Will this address the Federal plan for the Rim of the Valley Corridor study?*

A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and

municipal service area of a local governmental agency. The proposal to modify the City of Los Angeles's current sphere of influence boundary will not address the Rim of the Valley Corridor Study.

18. *What impact will an adopted sphere of influence have on the wildlife corridor that is so important across the 405 freeway and across the northern mountain ranges, that forms the bridge between the Angeles National Forest and the Los Padres Forest?*

A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. No development is proposed and there will be no impact on the wildlife corridor.

19. *How will the City utilize the SEA (significant ecological area) proposals issued by the County of Los Angeles, and the development standards set for the SEA's in the proposed sphere of influence.*

The county will still govern the unincorporated areas of the proposed sphere area.

The project proposes modification to an existing sphere of influence boundary for the City of Los Angeles, and does not propose development. Therefore, the proposal will not result in impact to endangered, threatened or rare species or their habitats, including but not limited to plant, fish, insect, animal, and/or bird habitats. The proposal does not propose the removal of oak trees, will not affect any wetland habitat or blue line stream, and will not create negative impacts to wildlife dispersal or migration corridors.



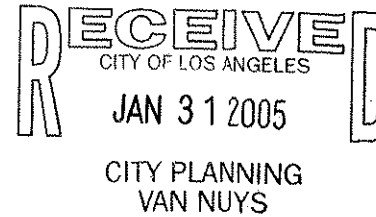
**SANTA MONICA MOUNTAINS CONSERVANCY**

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



January 24, 2005

Susan Whisnant  
Los Angeles Department of City Planning  
6262 Van Nuys Boulevard, Room 351  
Van Nuys, California 90401



**Proposed Negative Declaration ENV-204-7108: CF-00-2206**  
**North San Fernando Valley Sphere of Influence Amendment**

Dear Ms. Whisman:

All of the proposed 19,242 acre (30-square-mile) Sphere of Influence amendment area is located in the Rim of the Valley Trail Corridor established pursuant to § 33105.5 of the Public Resources Code. As stated in the Negative Declaration project description, "The project is a plan for modification to the adopted sphere in order to establish the probable ultimate physical boundaries and urban services areas of the City of Los Angeles."

We understand that the proposed action to amend the Sphere of Influence is not the final action, but a prerequisite, to annexing the subject area into the City of Los Angeles. The subject Negative Declaration rests on this "free pass" concept that the proposed project is not a "real" project with permanent physical and economic consequences and hence cannot result in potential negative impacts. The law may permit such a free pass. Nonetheless, as the principal State planning agency for the subject area, the potential impacts of the City annexing the subject 19,242 acres could have a significant adverse effect on the Rim of the Valley Trail Corridor portion of the Santa Monica Mountains Zone zone.

It can be stated across the board that annexation of any portion of the subject area, without existing approved development rights, will increase the probability of more intensive development in those areas. The requirement of the City to provide, or allow the construction of, roads and utilities to projects approved by the City within the City boundaries provides a "free pass" to many landowners currently constrained by infrastructure and access limitations. In most of these cases, the answer to what agency will be the best service provider shall be the City of Los Angeles. Using "service provision efficiency" as the principle determinate of where to expand the City boundary, it is a forgone conclusion that subsequent City studies will recommend annexation of virtually all

Susan Whisnant

Sphere of Influence Negative Declaration ENV-2004-7108

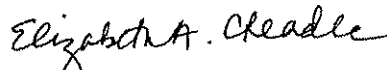
January 24, 2005

Page 2

of the subject 19,242 acres. As part of its consideration, it is critical that the City consider the potential long term, irreversible consequences on the quality and quantity of both public and private open in the subject area. More specifically the City may gain resources by moving towards annexation, however, it will inevitably lose valuable resource too. We urge the Planning Department to work early in the process with our staff on any annexation proceedings.

Please direct any questions or correspondence to Paul Edelman, Deputy Director of Natural Resources and Planning, at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth A. Cheadle".

ELIZABETH A. CHEADLE  
Chairperson

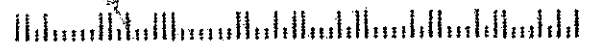
STATE OF CALIFORNIA - THE RESOURCES AGENCY  
SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK  
5750 RAMIREZ CANYON ROAD  
MALIBU, CALIFORNIA 90265



Susan Whisnant  
Los Angeles Dept of City Planning  
6262 Van Nuys Blvd, Room 351  
Van Nuys, CA 90401

91401+2762 21





May 2, 2005

Susan Whisnant  
Los Angeles Department of City Planning  
6262 Van Nuys Boulevard, Room 351  
Van Nuys, CA 90401

Re: Proposed Negative Declaration ENV-204-7108: CF-00-2206  
North San Fernando Valley Sphere of Influence Amendment

Dear Ms. Whisnant:

After reviewing the April 6, 2004 report regarding the proposed amendment to expand the boundaries of the City Sphere of Influence, Save Chatsworth first would like to clarify whether or not the City intends this expansion as a precursor to annexation of the subject areas. Annexation by the City is generally perceived as a promotion of urbanization.

Save Chatsworth, a coalition of community organizations and concerned citizens, supports the position (letter dated December 27, 2004) of the Neighborhood Councils of Chatsworth, Porter Ranch, Foothill Trails District, Sunland Tujunga, Sylmar and West Hills, and also the position of the Santa Monica Mountains Conservancy (letter dated January 24, 2005), and recommends that the City respect the parameters of the proposed SEA (significant ecological area) as outlined in the updated Los Angeles County General Plan. What is the City's commitment to the preservation of areas already designated as open space? Save Chatsworth believes that all designated open space areas within any proposed expansion of the Sphere of Influence should remain as such, and that new development in the foothill areas should be severely curtailed, due to ever-increasing impacts on traffic situations already impossible to fully mitigate, and the effects on the environment.

The City Planning Department's report of April 6, 2005 states that one of the issues supporting the proposed expansion of the Sphere of Influence is the preservation of the Los Angeles River. As we agree that the protection of the Los Angeles River Watershed is of vital importance, we would welcome specific information as to what additional storm water management mitigation measures the City would require beyond what is currently the standard for Los Angeles County.

Expansion of the City's service area could lead to more development. Save Chatsworth and the Chatsworth community have clearly stated their case regarding development through their lengthy struggle opposing the density of the recently approved Deerlake Ranch development project. The Save Chatsworth organization seeks to preserve the rural, equestrian lifestyle unique to communities such as Chatsworth, to protect distinctive geographic features and natural topography, and to promote responsible development.

Most sincerely,

Vanessa Watters  
President, Save Chatsworth

cc: Con Howe, Director of Planning, Los Angeles Department of City Planning  
Members of the Planning and Land Use Management Committee

## **Exhibit F: Sphere of Influence Amendment Application**

**LOS ANGELES SPHERE OF INFLUENCE AMENDMENT APPLICATION**  
**(Pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act**  
**of 2000, Division 3, Title 5 Commencing with Section 56000,**  
**of the Government Code)**

**TO: LOCAL AGENCY FORMATION COMMISSION**

County of Los Angeles  
Room 383, Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

**DESIGNATION OF PROPOSAL:** Amendment to Sphere of Influence

**AFFECTED CITY/DISTRICT:** City of Los Angeles

**RELATED JURISDICTIONAL CHANGES:** None

**GENERAL LOCATION OF PROPOSAL:** The proposed Sphere of Influence amendment area is located in north Los Angeles County, outside the existing limits of the City of Los Angeles. The general boundaries of the sphere are west to east, unincorporated areas near Dayton Canyon northward along the Ventura County line to the ridge line of the Santa Susana Mountains, turning eastwardly along the ridge line of the Santa Susana Mountains to the limits of the City of Santa Clarita at the Sierra Highway, and following the limits to the south and then east, and continuing to follow the ridge line eastward to and along the boundary of the Angeles National Forest, and turning southward along the limits of the City of Los Angeles to a terminus south of Little Tujunga Road.

**THOMAS GUIDE PAGE(S):** LA County: 480, 481, 482, 499, 500, 503, 504, 529,  
559, 4640, 4641, 4642  
Ventura County: 367, 479

**PROPOSAL INITIATED BY:** X **Resolution**    \_\_\_ **Landowner/Voter Petition**

**APPLICANT:** City of Los Angeles  
6262 Van Nuys Blvd., Room 351  
Van Nuys, CA 91401-2709

**SIGNED:** \_\_\_\_\_  
Daniel M. Scott, Senior City Planner

**TELEPHONE:** (818) 374-5069

**DATE:** May 10, 2005

## **I. THE SUBJECT AREA**

### **A. GENERAL DESCRIPTION**

1. **Acres or square miles:** 19,242 acres or slightly more than 30 square miles.
2. **Major highways and streets serving the area:** The proposed area is served by Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road.
3. **Topography:** Mountain ridges of varying heights; canyons and flat land make up the general topography of the area.
4. **Physical boundaries:**  
Santa Susana Mountain ridge line.

### **B. POPULATION AND HOUSING**

1. **Estimated population:** The estimated population for the proposed Sphere of Influence outside of the City limits is approximately 1,550 persons.
2. **Number of registered voters:** Approximately 800 voters.  
(2000 Los Angeles County Demographic Profile Prepared by the Los Angeles County Department of Regional Planning)
3. **Number and type of dwelling units:** The area within the proposed Sphere of Influence outside the incorporated city limits contains approximately 740 single-family and multi-family dwelling units. The area contains housing that is primarily single family dwelling units.

### **C. LAND USE AND ZONING**

1. **Existing land use in the subject area:** The existing land uses in the subject area are open space, with scattered single-family homes and multi-family homes.
2. **Planned land use designations in the surrounding area:**  
Land use designations will not change as a result of the amendment. The County of Los Angeles General Plan covers the area included within the proposed amendment area to the sphere of influence. The designations include: N1 (Non-urban 1), N2 (Non-urban 2: 0.5 to 1.0 dwelling units per acre), U1 (Urban 1: 1.1 to 3.3 dwelling units per acre), Urban 2 (Urban 2: 3.4 to 6.6 dwelling units per acre), U3 (Urban 3: 6.7 to 15.0 dwelling units per acre), U4 (Urban 4: 15.1 to 40 dwelling units per acre), C (Commercial), M (Industrial), RR (Resort recreational), W (Floodway and floodplains:

Special Management Area), and S (Significant Ecological Area [SEA]: Special Management Area).

## II THE PROPOSAL

- A. **Reasons for initiation of this proposal:** The Sphere of Influence Study was prepared by the City of Los Angeles to plan for the probable ultimate physical boundaries and urban service area of the a portion of the northern border of the City of Los Angeles. It is presented as an informational and advocacy tool to assist members of the Local Agency Formation Commission (LAFCO) in making their determinations pursuant to Government Code Section 56076.
- B. **Alternate course of action:** An alternate course of action is denial of the proposed sphere and continuation of the of the current sphere with a border coterminous with the limits of the City of Los Angeles.
- C. **Services and/or costs to residents or landowners in the area:** Services and/or costs to residents or landowners in the area would not be increased, reduced, or eliminated as a result of this proposal.
- D. **Terms or conditions requested as part of this proposal:** Standard LAFCO conditions are anticipated and acceptable.

## III. GENERAL

- A. **Names and addresses of persons, organization or agencies known to you who may be opposed to this proposal:**  
  
Palmer Investments, Inc.  
233 Wilshire Blvd., Suite 800  
Santa Monica, CA 90401
- B. **Names and addresses of persons who are to receive notice of hearing, staff report, and minutes:**  
  
City of Los Angeles Department of City Planning  
c/o Susan Whisnant, Planning Assistant  
6262 Van Nuys Blvd. Room 351  
Van Nuys, CA 91401-2709



John Wickham, CLA  
City Hall 255  
200 North Spring Street  
Los Angeles, CA 90012

Gerald Gubatan, CD 1  
City Hall 410  
200 North Spring Street  
Los Angeles, CA 90012

Dale Thrush, CD 2  
City Hall 475  
200 North Spring Street  
Los Angeles, CA 90012

Tom Henry, CD 3  
City Hall 450  
200 North Spring Street  
Los Angeles, CA 90012

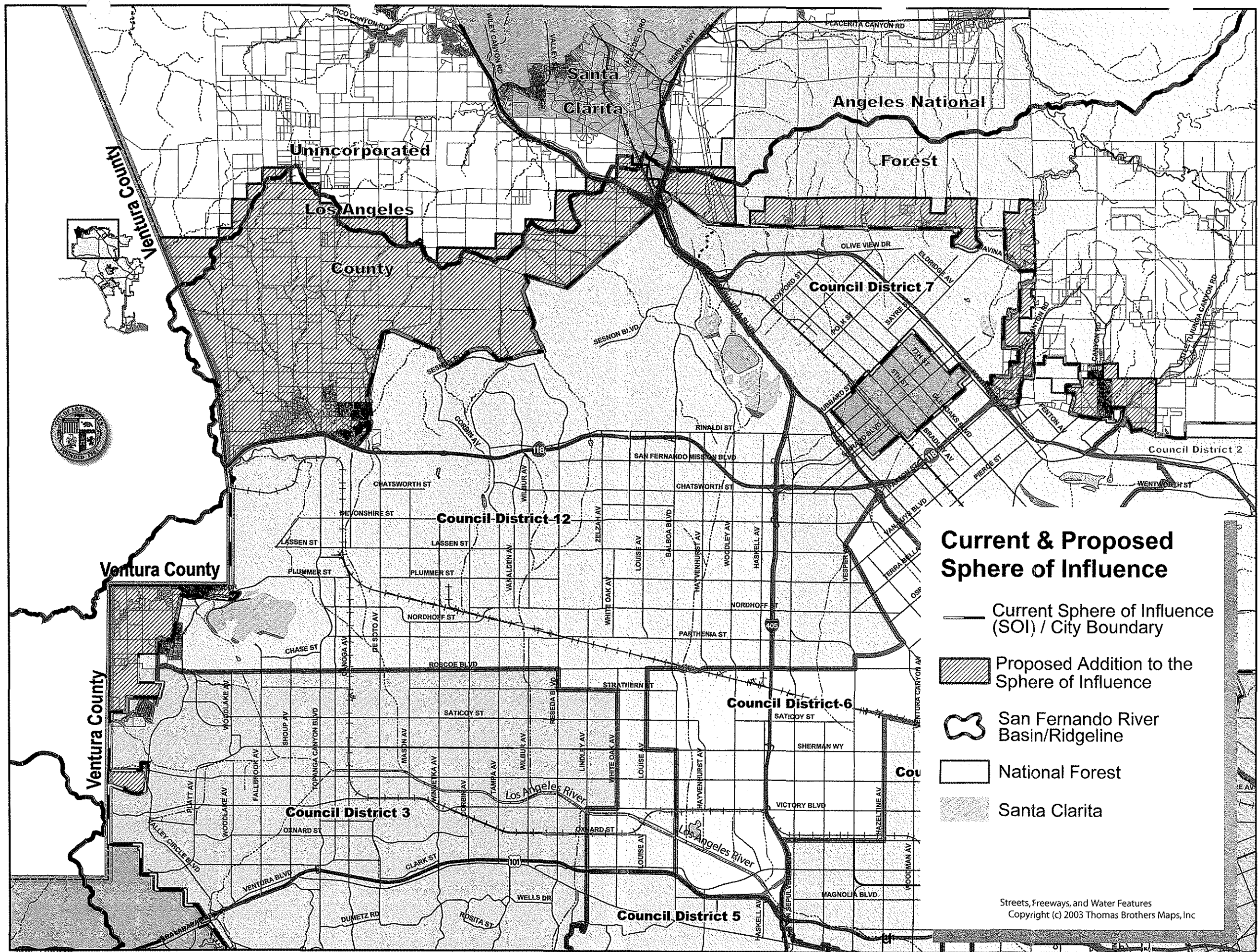
Renee Schillaci, CD 5  
City Hall 440  
200 North Spring Street  
Los Angeles, CA 90012

Jim Dantona, CD 6  
City Hall 445  
200 North Spring Street  
Los Angeles, CA 90012

Dan Rosales, CD 7  
City Hall 465  
200 North Spring Street  
Los Angeles, CA 90012

Kevin Keller, CD 11  
City Hall 415  
200 North Spring Street  
Los Angeles, CA 90012

Phyllis Winger, CD 12  
City Hall 405  
200 North Spring Street  
Los Angeles, CA 90012



**Exhibit A**

**Exhibit G: Resolution to Initiate Proceedings to Adopt an  
Amended Sphere of Influence**

## RESOLUTION

A RESOLUTION OF THE APPLICATION BY THE  
CITY COUNCIL OF THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA,  
REQUESTING THE LOCAL AGENCY FORMATION COMMISSION OF THE COUNTY OF LOS ANGELES TO  
INITIATE PROCEEDINGS TO ADOPT AN AMENDED SPHERE OF INFLUENCE FOR, AND AS PROPOSED BY,  
THE CITY OF LOS ANGELES.

WHEREAS, the City of Los Angeles desires to initiate proceedings pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, Division 3, commencing with Section 56000 of the California Government Code;

WHEREAS, this proposal is consistent with the spirit and intent of the California Government Code commencing with Section 56425;

WHEREAS, the territory proposed to be included in this sphere of influence is set forth in Exhibit "A", attached hereto and by this reference incorporated;

WHEREAS, the City has prepared and adopted a comprehensive general plan for the City;

WHEREAS, the City Council of the City of Los Angeles conducted a public meeting on May 4, 2005 pursuant to applicable law, to consider the proposed sphere of influence;

WHEREAS, the reasons for this proposed sphere of influence are as follows:

3. Facilitate orderly growth in the unincorporated areas adjacent to the City of Los Angeles;
4. Coordinate property development standards and encourage timely provision of adequate and essential services such as streets, sewer, water, police and fire protection, parks and recreation, flood control, and solid waste disposal, as urbanization of unincorporated areas occurs;
5. Promote cooperative planning between the City of Los Angeles and the County of Los Angeles, various public/private service entities, and major landowners, and so facilitate proper implementation of their respective general or master plans;
6. Assist all government agencies and private entities in planning and scheduling the logical, orderly, and economic extension of their facilities and services, thus avoiding expensive and unnecessary duplication of effort;
7. Promote, assist, and enhance property owners' ability to plan comprehensively, and with reasonable assurance, for the ultimate use and development of their lands; and

WHEREAS, the City Council of the City of Los Angeles, California, has considered all evidence, oral and documentary, and is advised in the premises;

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Los Angeles, California, does hereby determine and find as follows:

Section 1. This resolution is hereby adopted and approved by the City Council, and the Local Agency Formation Commission of the County of Los Angeles is hereby requested to initiate proceedings to adopt an amended sphere of influence as mapped in Exhibit "A", which is incorporated herein by this reference, according to the terms and conditions stated above, and in the manner provided by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

Section 2. The City Council hereby directs and authorizes the City Clerk of the City of Los Angeles to file a certified copy of this resolution with the Executive Officer of the Local Agency Formation Commission of the County of Los Angeles.

Section 3. The City Clerk shall certify the adoption of this resolution.

PASSED, APPROVED, AND ADOPTED this \_\_\_\_\_ day of \_\_\_\_\_, 2005.

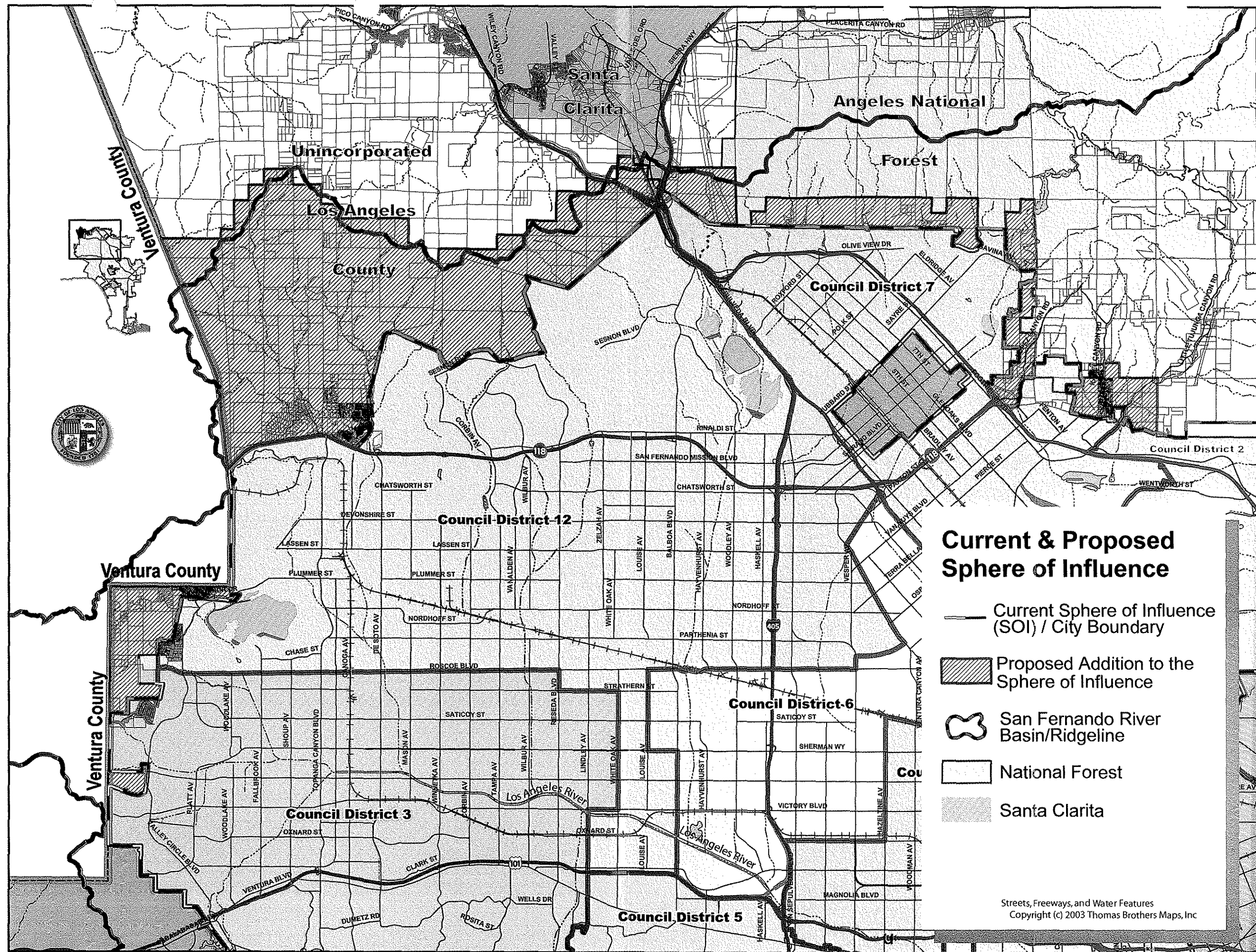
ATTEST:

\_\_\_\_\_  
Frank T. Martinez, City Clerk

STATE OF CALIFORNIA       )  
COUNTY OF LOS ANGELES   )  
CITY OF LOS ANGELES       )

I, Frank T. Martinez, City Clerk of the City of Los Angeles, do hereby certify that the foregoing Resolution was duly adopted by the City Council of the City of Los Angeles.





**Exhibit A**

## **H. Additional Information Relating to Environmental Clearance and Finding**

Additional Information Relating to Environmental Clearance  
May 4, 2005

1. Although Las Lomas has applied to the City Planning Department to prepare an environmental impact report discussing the potential impacts of annexation, plan amendments and zone changes to enable a development which lies partly within the proposed SOI, an analysis of those impacts is not required in order to submit the City's application for SOI to LAFCO for approval. That application to prepare an EIR was not accompanied by any applications for land use changes or entitlements, and none have been submitted to the City to date. Upon payment of a fee, and proper application, the Planning Department will review and process an environmental document even if actual applications for entitlements are not sought at that time. However, the City does not complete or certify an EIR unless it is asked to approve an entitlement for land use, and CEQA does not require it to do so.
2. There are currently no applications, by Las Lomas or others, for zone changes, plan amendments or other permits or approvals within the jurisdiction of the City of Los Angeles which would allow development in the SOI area.
3. The Planning Department prepared a negative declaration in connection with City Council's November, 2000, proposal to submit an application to LAFCO for extension of the City's SOI. The negative declaration has helped the City to determine whether there may be a impact to the environment as a result of the approval of the SOI. This negative declaration will be forwarded to LAFCO, which will have the ultimate determination whether to adopt the negative declaration at the time it acts upon the City's application for amendment to the SOI.
4. The City's SOI application, if granted by LAFCO, does not allow any changes in development intensities to the area to be included, which would still be subject to existing County land use regulations.
5. The City Planning Department is currently willing to process Las Lomas' request for preparation of an EIR for use with any applications for land use entitlements which Las Lomas may request in the future. However, the Planning Department's determination to prepare a draft EIR, although it relates to a portion of the same property encompassed in the SOI application, is separate from the determination of whether an EIR is required for the City's application to extend the SOI. The SOI is not accompanied by any applications for annexation, pre-zoning or other changes in the permitted density or use of the area to be included in the SOI, and there are no other pending applications or activities which would result in environmental changes as a result of the adoption of the SOI. For those reasons, the Planning Department has concluded that a negative declaration, and not an EIR, is appropriate for the SOI.

The Planning Department recommends that City Council find, based on the whole record before it, including the initial study and all comments received, that there is no substantial evidence that adoption of the sphere of influence may have a significant effect on the environment; and that the Negative Declaration represents the independent judgment and analysis of the City.



**I. Sphere of Influence Motion  
CF 00-2206**

FRANK T. MARTINEZ  
City Clerk

KAREN E. KALFAYAN  
Executive Officer

When making inquiries  
relative to this matter  
refer to File No.

05-0671

CITY OF LOS ANGELES  
CALIFORNIA



JAMES K. HAHN  
MAYOR

Office of the  
CITY CLERK  
Council and Public Services  
Room 395, City Hall  
Los Angeles, CA 90012  
Council File Information - (213) 978-1043  
General Information - (213) 978-1133  
Fax: (213) 978-1040

HELEN GINSBURG  
Chief, Council and Public Services Division

May 6, 2005

ALL COUNCILMEMBERS:

The attached copy of a Negative Declaration, in connection with Council File No. 05-0671 is being sent to you for your information and review before it is considered by the City Council on May 10, 2005, as Item No. 35, Council District Nos. 2, 3, 7 and 13.

City Clerk  
crm

CITY OF LOS ANGELES  
OFFICE OF THE CITY CLERK  
ROOM 395, CITY HALL  
LOS ANGELES, CALIFORNIA 90012  
**CALIFORNIA ENVIRONMENTAL QUALITY ACT**  
**PROPOSED NEGATIVE DECLARATION**  
(Article V- City CEQA Guidelines)

|                     |                             |                                   |                |
|---------------------|-----------------------------|-----------------------------------|----------------|
| NOV 22 2004<br>Date | Certified by<br>[Signature] | Ne 1841-04<br>City Clerk's Office | DOCUMENT FILED |
|---------------------|-----------------------------|-----------------------------------|----------------|

|                                                                                                                                                                                                                                                                                                                                                                        |                                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| <b>LEAD AGENCY</b><br>LOS ANGELES CITY PLANNING DEPARTMENT                                                                                                                                                                                                                                                                                                             | <b>COUNCIL DISTRICTS</b><br>CD 12, CD 7, and CD 2 |
| <b>PROJECT TITLE</b><br>Change of Organization or reorganization pursuant to the Cortese-Knox-Hertzberg Local Reorganization Act of 2000 (Title 5, Division 3, commencing with Section 56000 of the California government Code) relative to an amendment to boundaries of the Sphere of Influence for the City of Los Angeles.<br>"Sphere of Influence per CF-00-2206" | <b>CASE #</b><br>ENV-2004-7108-ND<br>CF-00-2206   |

**PROJECT LOCATION**  
The proposed Sphere of Influence amendment area is located in north Los Angeles County, outside the existing limits of the City of Los Angeles. The general boundaries of the sphere are west to east, unincorporated areas near Dayton Canyon northward along the Ventura County line to the ridge line of the Santa Susanna Mountains, turning eastwardly along the ridge line of the Santa Susanna Mountains to the limits of the City of Santa Clarita at the Sierra Highway, and following the limits to the south and then east, and continuing to follow the ridge line eastward to and along the boundary of the Angeles National Forest, and turning southward to a terminus south of Little Tujunga Road. The project area is served by Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road. Undeveloped National Forest lands lie to the east of the proposed sphere boundary. To the south is the City of Los Angeles, whose northern boundary is developed primarily with single family residential dwellings to the west of Interstate 5, and light industrial development to the east. West of the proposed project area is the County of Ventura, developed with agricultural uses and scattered single family dwelling units. To the northwest of the project area are the undeveloped Santa Susanna Mountains that separate the San Fernando and Simi Valleys.

**PROJECT DESCRIPTION**  
The project is a plan for modification to the adopted sphere in order to establish the probable ultimate physical boundaries and urban service area of the City of Los Angeles. The plan reflects the most efficient provision of future services including police, fire and utilities, and establishes who would have responsibility to provide such services. It is not an annexation nor initiation of annexation proceedings and does not change jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use. The proposed project covers 19,242 acres, or slightly more than 30 square miles.

**NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY**

**FINDING:**  
The City Planning Department of the City of Los Angeles has proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the responses of the Lead City Agency. The project decisionmaker may adopt this mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

**THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.**

|                                                                                                                      |                                                                                                  |                                           |
|----------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|-------------------------------------------|
| <b>NAME OF PERSON PREPARING THIS FORM</b><br>M. Susan Whisnant                                                       | <b>TITLE</b><br>Planning Assistant                                                               | <b>TELEPHONE NUMBER</b><br>(818) 374-5044 |
| <b>ADDRESS</b><br>Los Angeles Department of City Planning<br>6262 Van Nuys Boulevard, Room 351<br>Van Nuys, CA 90401 | <b>SIGNATURE (Official)</b><br>Daniel M. Scott, Senior City Planner<br>[Signature: Daniel Scott] | <b>DATE</b><br>November 18, 2004          |

Exhibit E

# CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK  
ROOM 615, CITY HALL  
LOS ANGELES, CALIFORNIA 90012

## CALIFORNIA ENVIRONMENTAL QUALITY ACT

### INITIAL STUDY AND CHECKLIST

(Article IV – City CEQA Guidelines)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                   |                                                                                                                                                                                        |                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| <b>LEAD CITY AGENCY</b><br>Los Angeles Department of City Planning                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                   | <b>COUNCIL DISTRICTS</b><br>CD 12, CD 7, and CD 2                                                                                                                                      | <b>DATE</b><br>November 18, 2004                                                                   |
| <b>RESPONSIBLE AGENCIES</b><br>Los Angeles County Local Agency Formation Commission (LAFCO)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                   |                                                                                                                                                                                        |                                                                                                    |
| <b>PROJECT TITLE/NO.</b><br>Change of Organization or reorganization pursuant to the Cortese-Knox-Hertzberg Local Reorganization Act of 2000 (Title 5, Division 3, commencing with Section 56000 of the California government Code) relative to an amendment to boundaries of the Sphere of Influence for the City of Los Angeles.<br>Sphere of Influence per CF-00-2206                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                   | <b>CASE NO.</b><br>ENV-2004-7108-ND<br>CF-00-2206                                                                                                                                      |                                                                                                    |
| <b>PREVIOUS ACTIONS CASE NO.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                   | <input checked="" type="checkbox"/> DOES have significant changes from previous actions.<br><input type="checkbox"/> DOES NOT have significant changes from previous actions.          |                                                                                                    |
| <b>PROJECT DESCRIPTION:</b><br>The project is a plan for modification to the adopted sphere in order to establish the probable ultimate physical boundaries and urban service area of the City of Los Angeles. The plan reflects the most efficient provision of future services including police, fire and utilities, and establishes who would have responsibility to provide such services. It is not an annexation nor initiation of annexation proceedings and does not change jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use. The proposed project covers 19,242 acres, or slightly more than 30 square miles.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                   |                                                                                                                                                                                        |                                                                                                    |
| <b>ENVIRONMENTAL SETTING:</b><br>The project area is comprised of mountain ridges of varying heights, canyons and flat land. It is open space developed with approximately 740 single family dwelling units and multi-family dwellings that serve a population of approximately 1,550 persons including approximately 800 voters (according to the 2000 Los Angeles County Demographic prepared by the Los Angeles County Department of Regional Planning).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                   |                                                                                                                                                                                        |                                                                                                    |
| <b>PROJECT LOCATION</b><br>The proposed Sphere of Influence amendment area is located in north Los Angeles County, outside the existing limits of the City of Los Angeles. The general boundaries of the sphere are west to east, unincorporated areas near Dayton Canyon northward along the Ventura County line to the ridge line of the Santa Susanna Mountains, turning eastwardly along the ridge line of the Santa Susanna Mountains to the limits of the City of Santa Clarita at the Sierra Highway, and following the limits to the south and then east, and continuing to follow the ridge line eastward to and along the boundary of the Angeles National Forest, and turning southward to a terminus south of Little Tujunga Road. The project area is served by Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road. Undeveloped National Forest lands lie to the east of the proposed sphere boundary. To the south is the City of Los Angeles, whose northern boundary is developed primarily with single family residential dwellings to the west of Interstate 5, and light industrial development to the east. West of the proposed project area is the County of Ventura, developed with agricultural uses and scattered single family dwelling units. To the northwest of the project area are the undeveloped Santa Susanna Mountains that separate the San Fernando and Simi Valleys. |                                   |                                                                                                                                                                                        |                                                                                                    |
| <b>PLANNING DISTRICT</b><br>Chatsworth Porter Ranch, Northridge, Granada Hills-Knoilwood, Sylmar, Sunland-Tujunga Lakeview Terrace- Shadow Hills-East La Tuna Canyon                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                   | <b>STATUS:</b><br><input type="checkbox"/> PRELIMINARY<br><input type="checkbox"/> PROPOSED<br><input checked="" type="checkbox"/> ADOPTED: 7/14/1993, 7/10/1996, 8/6/1987, 11/18/1997 |                                                                                                    |
| <b>EXISTING ZONING</b><br>Land use designations would follow the County of Los Angeles General Plan as follows: N1 (Non-urban 1), N2 (Non-urban 2: 0.5 to 1.0 dwelling units per acre), U1 (Urban 1: 1.1 to 3.3 dwelling units per acre), Urban 2 (Urban 2: 3.4 to 6.6 dwelling units per acre), U3 (Urban 3: 6.7 to 15.0 dwelling units per acre), U4 (Urban 4: 15.1 to 40 dwelling units per acre), C (Commercial), M (Industrial), RR (Resort recreational), W (Flood way and flood plains: Special Management Area), and S (Significant Ecological Area (SEA): Special Management Area).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>MAX. DENSITY ZONING</b><br>n/a |                                                                                                                                                                                        | <input type="checkbox"/> DOES CONFORM TO PLAN<br><input type="checkbox"/> DOES NOT CONFORM TO PLAN |
| <b>PLANNED LAND USE &amp; ZONE</b><br>No change in land use and zoning.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>MAX. DENSITY PLAN</b><br>n/a   |                                                                                                                                                                                        |                                                                                                    |

|                                                                                                                                                                                     |                                 |                                                                                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|----------------------------------------------------------------------------------------------------|
| <b>PLANNED LAND USE &amp; ZONE</b><br>No change in land use and zoning.                                                                                                             | <b>MAX. DENSITY PLAN</b><br>n/a | <input type="checkbox"/> DOES CONFORM TO PLAN<br><input type="checkbox"/> DOES NOT CONFORM TO PLAN |
| <b>SURROUNDING LAND USES</b><br>Undeveloped National Forest lands, single family residential dwellings, light industrial development, agricultural lands, Sunshine Canyon landfill. | <b>PROJECT DENSITY</b><br>n/a   | <input checked="" type="checkbox"/> NO DISTRICT PLAN                                               |

### DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

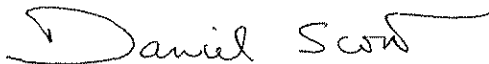
☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Daniel M. Scott  
SIGNATURE

Senior City Planner  
TITLE

### EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," cross referenced).

- a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
  - 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
  - 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
  - 9) The explanation of each issue should identify:
    - a) The significance criteria or threshold, if any, used to evaluate each question; and
    - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

---

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |                                                 |                                                        |                                                             |
|-------------------------------------------------|--------------------------------------------------------|-------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics             | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Hydrology/Water Quality       | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Air Quality            | <input type="checkbox"/> Land Use/Planning             | <input type="checkbox"/> Transportation/Traffic             |
| <input type="checkbox"/> Biological Resources   | <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Utilities/Service Systems          |
| <input type="checkbox"/> Cultural Resources     | <input type="checkbox"/> Noise                         | <input type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Geology/Soils          | <input type="checkbox"/> Population/Housing            |                                                             |

---

## INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

---

### BACKGROUND

#### PROPONENT NAME

City of Los Angeles

#### PHONE NUMBER

(818) 374-5069

#### PROPONENT ADDRESS

6262 Van Nuys Boulevard, Room 351  
Van Nuys, CA 91401-2709

#### AGENCY REQUIRING CHECKLIST

Los Angeles Department of City Planning

#### DATE SUBMITTED

November 18, 2004

#### PROPOSAL NAME (If Applicable)

Sphere of Influence per CF-00-2206

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**ENVIRONMENTAL IMPACTS**

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

| Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact |
|-----------------------------------|--------------------------------------------------------------|---------------------------------|-----------|
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**I. AESTHETICS.** Would the project:

- a. Have a substantial adverse effect on a scenic vista?
- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?
- c. Substantially degrade the existing visual character or quality of the site and its surroundings?
- d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

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| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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**II. AGRICULTURAL RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?
- c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

|                          |                          |                          |                                     |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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**III. AIR QUALITY.** The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:

- a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?
- b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

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|                                                                                                                                                                                                                                | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
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| c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Expose sensitive receptors to substantial pollutant concentrations?                                                                                                                                                         | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Create objectionable odors affecting a substantial number of people?                                                                                                                                                        | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**IV. BIOLOGICAL RESOURCES.** Would the project:

|                                                                                                                                                                                                                                                                                                              |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ?                                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?                                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?                                                                                                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**V. CULTURAL RESOURCES:** Would the project:

|                                                                                                                   |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|



|                                                                                                                      | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
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| b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?              | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Disturb any human remains, including those interred outside of formal cemeteries?                                 | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**VI. GEOLOGY AND SOILS.** Would the project:

a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving :

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii. Strong seismic ground shaking?

iii. Seismic-related ground failure, including liquefaction?

iv. Landslides?

b. Result in substantial soil erosion or the loss of topsoil?

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

|                          |                          |                          |                                     |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**VII. HAZARDS AND HAZARDOUS MATERIALS.** Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials

|                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?                                                                  | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?                                                                                                  | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?                                   | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?                                                                                                          | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?                                                                                                                                        | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?                                             | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**VIII. HYDROLOGY AND WATER QUALITY.** Would the proposal result in:

|                                                                                                                                                                                                                                                                                                                                                                                      |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Violate any water quality standards or waste discharge requirements?                                                                                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?                                                                                                                                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                                                                                                           | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
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| d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?                                                                                     | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. Otherwise substantially degrade water quality?                                                                                                                                                                                                                         | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?                                                                                                              | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| h. Place within a 100-year flood plain structures which would impede or redirect flood flows?                                                                                                                                                                             | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?                                                                                                        | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| j. Inundation by seiche, tsunami, or mudflow?                                                                                                                                                                                                                             | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**IX. LAND USE AND PLANNING.** Would the project:

|                                                                                                                                                                                                                                                                                                 |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Physically divide an established community?                                                                                                                                                                                                                                                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan?                                                                                                                                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**X. MINERAL RESOURCES.** Would the project:

|                                                                                                                                                                        |                          |                          |                          |                                     |
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| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XI. NOISE.** Would the project:

|                                                                                                                                                                                                                                                                     | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?                                                                               | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                              | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                                      | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                          | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?                                                                                                      | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**XII. POPULATION AND HOUSING.** Would the project:

|                                                                                                                                                                                                          |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?                                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XIII. PUBLIC SERVICES.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

|                       |                          |                          |                          |                                     |
|-----------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Fire protection?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

|                                                   | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
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| c. Schools?                                       | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Parks?                                         | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Other governmental services (including roads)? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

#### XIV. RECREATION.

|                                                                                                                                                                                                                |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

#### XV. TRANSPORTATION/CIRCULATION. Would the project:

|                                                                                                                                                                                                                                                                                        |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to ratio capacity on roads, or congestion at intersections)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?                                                                                                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?                                                                                                                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?                                                                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Result in inadequate emergency access?                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Result in inadequate parking capacity?                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?                                                                                                                                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XVI. UTILITIES.** Would the project:

|                                                                                                                                                                                                                                   | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?                                                                                                                               | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                            | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                                      | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?                                                                             | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?                                                                                                            | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| g. Comply with federal, state, and local statutes and regulations related to solid waste?                                                                                                                                         | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**XVII. MANDATORY FINDINGS OF SIGNIFICANCE.**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Does the project have impacts which are individually limited, but cumulatively considerable?<br>("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).                                                                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?                                                                                                                                                                                                                                                                                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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## DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)

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The list of impact categories and subcategories were prepared pursuant to the public Resources Code and the California Environmental Quality Act (CEQA). [Please see the following sections of the Public Resources Code and CEQA Guidelines: Public Resources code section 21082.2 (Significant effect based on substantial evidence, not public controversy or speculation), CEQA sections 15063 (Initial Study), 15064 (Determining the Significance of Environmental Effects Caused by a Project), 15065 (Mandatory Findings of Significance), 15070 (Decision to Prepare a Negative or Mitigated Negative Declaration; ND/MND), 15071 (Contents {of ND/MND}) and 15047 (Consideration and Adoption of a Negative Declaration or Mitigated Negative Declaration)]

The Public Resources Code and CEQA Guidelines explicitly indicate "substantial evidence" as a basis for determining the significance of impacts on the environment caused by a Project. Public Resources code section 21082.2 (c) states - "argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." Public Resources Code section 21082.2 (b) states - "The existence of public controversy over the environmental effects of a project shall not require preparation of an environmental impact report if there is no substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment" (also see CEQA Guidelines sections 15382 and 15384).

Furthermore, the determination to prepare a Negative or Mitigated Negative Declaration (ND/MND) or an Environmental Impact Report (EIR) is reached by the examination of certain facts and supporting data, which clearly support the method of disclosure (i.e. ND/MND, EIR), alternatives, and mitigation of environmental impacts. The following criteria must be evident when an EIR is required by the Lead Agency (CITY OF LOS ANGELES) per CEQA Guidelines section 15065 (Mandatory Findings of Significance); a project will have a significant effect if it will:

- Substantially degrade environmental quality
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self-sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that will cause substantial adverse effects on human beings.

| PREPARED BY       | TITLE              | TELEPHONE #    | DATE          |
|-------------------|--------------------|----------------|---------------|
| M. Susan Whisnant | Planning Assistant | (818) 374-5044 | November 2004 |

C:\WINNT\Profiles\swhisnan\Desktop\Sphere Package 3-30 .wpd

## **Exhibit F: Sphere of Influence Amendment Application**



**LOS ANGELES SPHERE OF INFLUENCE AMENDMENT APPLICATION**  
**(Pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act**  
**of 2000, Division 3, Title 5 Commencing with Section 56000,**  
**of the Government Code)**

**TO: LOCAL AGENCY FORMATION COMMISSION**

County of Los Angeles  
Room 383, Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

**DESIGNATION OF PROPOSAL:** Amendment to Sphere of Influence

**AFFECTED CITY/DISTRICT:** City of Los Angeles

**RELATED JURISDICTIONAL CHANGES:** None

**GENERAL LOCATION OF PROPOSAL:** The proposed Sphere of Influence amendment area is located in north Los Angeles County, outside the existing limits of the City of Los Angeles. The general boundaries of the sphere are west to east, unincorporated areas near Dayton Canyon northward along the Ventura County line to the ridge line of the Santa Susana Mountains, turning eastwardly along the ridge line of the Santa Susana Mountains to the limits of the City of Santa Clarita at the Sierra Highway, and following the limits to the south and then east, and continuing to follow the ridge line eastward to and along the boundary of the Angeles National Forest, and turning southward along the limits of the City of Los Angeles to a terminus south of Little Tujunga Road.

**THOMAS GUIDE PAGE(S):** LA County: 480, 481, 482, 499, 500, 503, 504, 529,  
559, 4640, 4641, 4642  
Ventura County: 367, 479

**PROPOSAL INITIATED BY:** ☒ **Resolution**    ☐ **Landowner/Voter Petition**

**APPLICANT:** City of Los Angeles  
6262 Van Nuys Blvd., Room 351  
Van Nuys, CA 91401-2709

**SIGNED:** \_\_\_\_\_  
Daniel M. Scott, Senior City Planner

**TELEPHONE:** (818) 374-5069

**DATE:** May 4, 2005

## I. THE SUBJECT AREA

### A. GENERAL DESCRIPTION

1. **Acres or square miles:** 19,242 acres or slightly more than 30 square miles.
2. **Major highways and streets serving the area:** The proposed area is served by Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road.
3. **Topography:** Mountain ridges of varying heights; canyons and flat land make up the general topography of the area.
4. **Physical boundaries):**  
Santa Susana Mountain ridge line.

### B. POPULATION AND HOUSING

1. **Estimated population:** The estimated population for the proposed Sphere of Influence outside of the City limits is approximately 1,550 persons.
2. **Number of registered voters:** Approximately 800 voters.  
(2000 Los Angeles County Demographic Profile Prepared by the Los Angeles County Department of Regional Planning)
3. **Number and type of dwelling units:** The area within the proposed Sphere of Influence outside the incorporated city limits contains approximately 740 single-family and multi-family dwelling units. The area contains housing that is primarily single family dwelling units.

### C. LAND USE AND ZONING

1. **Existing land use in the subject area:** The existing land uses in the subject area are open space, with scattered single- family homes and multi-family homes.
2. **Planned land use designations in the surrounding area:**  
Land use designations will not change as a result of the amendment. The County of Los Angeles General Plan covers the area included within the proposed amendment area to the sphere of influence. The designations include: N1 (Non-urban 1), N2 (Non-urban 2: 0.5 to 1.0 dwelling units per acre), U1 (Urban 1: 1.1 to 3.3 dwelling units per acre), Urban 2 (Urban 2: 3.4 to 6.6 dwelling units per acre), U3 (Urban 3: 6.7 to 15.0 dwelling units per acre), U4 (Urban 4: 15.1 to 40 dwelling units per acre), C (Commercial), M (Industrial), RR (Resort recreational), W (Floodway and floodplains: Special Management Area), and S (Significant Ecological Area [SEA]: Special Management Area).

## II THE PROPOSAL

- A. **Reasons for initiation of this proposal:** The Sphere of Influence Study was prepared by the City of Los Angeles to plan for plan for the probable ultimate physical boundaries and urban service area of the a potion of the northern border of the City of Los Angeles. It is presented as an informational and advocacy tool to assist members of the Local Agency Formation Commission (LAFCO) in making their determinations pursuant to Government Code Section 56076.
- B. **Alternate courses of action:** Alternate course of action are denial of the proposed sphere and continuation of the of the current sphere with a border coterminous with the limits of the City of Los Angeles.
- C. **Services and/or costs to residents or landowners in the area:**  
Services and/or costs to residents or landowners in the area would not be increased, reduced, or eliminated as a result of this proposal.
- D. **Terms or conditions requested as part of this proposal:**  
Standard LAFCO conditions are anticipated and acceptable.

## III. GENERAL

- A. **Names and addresses of persons, organization or agencies known to you who may be opposed to this proposal:**  
Carlyle W. Hall, Jr. for Las Lomas  
Akin Gump Strauss Hauer & Feld  
2029 Century Park East, Suite 2400  
Los Angeles, CA 90067-3012  
(310) 728-3242
- B. **Names and addresses of persons who are to receive notice of hearing, staff report, and minutes:**  
  
City of Los Angeles, Planning Department  
c/o Susan Whisnant, Planning Assistant  
6262 Van Nuys Blvd. Room 351  
Van Nuys, CA 91401-2709  
  
John Wickham, CLA  
City Hall 255  
200 North Spring Street  
Los Angeles, CA 90012

Dale Thrush, CD 2  
City Hall 475  
200 North Spring Street  
Los Angeles, CA 90012

Tom Henry, CD 3  
City Hall 450  
200 North Spring Street  
Los Angeles, CA 90012

Dan Rosales, CD 7  
City Hall 465  
200 North Spring Street  
Los Angeles, CA 90012

Kevin Keller, CD 11  
City Hall 415  
200 North Spring Street  
Los Angeles, CA 90012

Phyllis Winger, CD 12  
City Hall 405  
200 North Spring Street  
Los Angeles, CA 90012

**Exhibit G: Resolution to Initiate Proceedings to Adopt an  
Amended Sphere of Influence**

[Previous](#)[Back to Results](#)[Search Again](#)[Next](#)**File Number**

00-2206

**Last Changed Date**

04/08/2005

**Title****sphere of influence** - PORTIONS OF SAN FERNANDO VALLEY**Initiated by**

Bernson Mover 2000 / Galanter

**Subject**

Motion - The City of Santa Clarita recently submitted a **sphere of influence** application to the Local Agency Formation Commission (LAFCO) that claims portions of the San Fernando Valley. LAFCO will soon consider Santa Clarita's proposal. The City has indicated to LAFCO that the Santa Clarita sphere should not include any part of the San Fernando Valley, and that the southern boundary of the sphere should be drawn at the crest of the San Gabriel and Santa Susanna mountains.

The City of Los Angeles **sphere of influence** is currently coterminous with the City boundary, though large areas of the San Fernando Valley remain unincorporated. The City should apply to LAFCO for a sphere that includes these unincorporated and largely undeveloped areas.

The intent of a **sphere of influence** is to determine the most efficient provision of services, including police, fire, and utilities. The City of Los Angeles clearly has the greatest ability to provide these services and more to the unincorporated areas of the San Fernando Valley. Should these areas ever develop, the City would have responsibility to provide services and should have some influence over how these development decisions are made.

THEREFORE MOVE that the City of Los Angeles submit an application to LAFCO for a **sphere of influence** that includes the unincorporated portions of the San Fernando Valley.

FURTHER MOVE that the Council direct the City Planning Dept with assistance from the Chief of Legislative Analyst to prepare an application to LAFCO for a **sphere of influence** and report back to the P&LUM Comt within 45 days.

REFER TO COUNCIL FILE 05-0671

**Date Received**

11/07/2000

**File History**

11-7-00 - This day's Council session

11-7-00 - File to Calendar Clerk for placement on next available Council agenda

11-14-00 - Council Action - Motion ADOPTED

11-20-00 - File in files

[Previous](#)[Back to Results](#)[Search Again](#)[Next](#)

**Fred McHaddad**  
**14102 Tiara Street**  
**Van Nuys, CA 91401**  
**(818)780-0169**

*Fred McHaddad*  
*Ante a 5-4-05*

May 3, 2005

Honorable Eduardo Reyes  
Councilmember  
Chair, Planning and Land Use Committee (PLUM)  
200 North Spring Street  
Los Angeles, CA 90012

Re: Sphere of Influence Amendment, May 4, 2005 PLUM Agenda Item No. 3

Dear Councilmember Reyes:

We are the owners of the property indicated on the proposed City of Los Angeles ("City") Sphere of Influence ("SOI") amendment as the Las Lomas project. We are writing to you because of our concern that the action to be taken by PLUM and thereafter the City Council of the City of Los Angeles to approve the proposed SOI amendment would severely prejudice any project which could be developed on our property as well as substantially diminish the value of our land.

As you are aware, we have collectively agreed to sell our properties to the Las Lomas Land Company ("LLLC") for development of the Las Lomas project. We have been working with LLLC to assist in the application and entitlement process for the Las Lomas project in the City. We have also been before the Local Agency Formation Commission to communicate our desire not to be included in any sphere of influence amendment or annexation by the City of Santa Clarita, and have commenced a process with the County of Los Angeles to consolidate our properties into one legal parcel in order to insure that our interests are evaluated collectively and not on a property by property basis.

The value of our property is directly linked to the ability to obtain vital resources such as water and power which is only available on an extremely limited basis from either the city of Santa Clarita or Los Angeles County. For this reason, we are steadfast and resolute in our intention to annex our properties into the City of Los Angeles which has already indicated its ability to provide adequate resources for development purposes.

We believe that any action taken with regard to our properties prior to a full review and analysis of the Las Lomas project and consideration of our request to annex

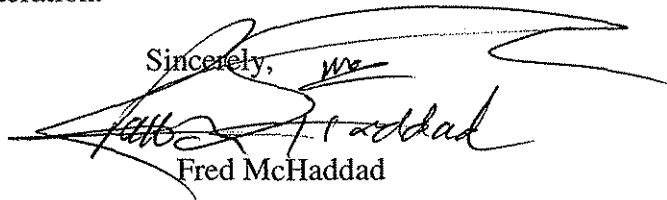
into the City of Los Angeles would prejudice the outcome of our request and severely prejudice our ability to gain a fair hearing on the matters we have put before the City. Additionally, we do not understand how the City can undertake to impact our properties in this manner on the basis of a negative declaration when at the same time it is processing a full environmental impact report concerning these same properties. In our view, the negative declaration proposed for your action is woefully inadequate in describing the impact to our properties and the environment which would result from the expansion of the City's sphere of influence in the manner described.

Finally, we are most outraged by the fact that the action you are proposing to undertake is being done pursuant to a "backroom" deal which has been reached between the City of Los Angeles and the City of Santa Clarita as has been reported in both the Daily News and the Los Angeles Times. We believe it is reprehensible for any government agency to act in such an underhanded manner as to attempt to deny the rights of property owners without allowing them to be heard on the merits of their case or to afford them due process prior to predetermining the outcome of their request.

In this regard, we ask that you disregard the backroom deal and either amend the proposal to include all of our properties as we have requested or exclude all of our properties from the proposed SOI until such time as the Las Lomas project is heard on its merits.

Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "Fred McHaddad", is written over a horizontal line. The signature is stylized and cursive.

Fred McHaddad





**CHATSWORTH NEIGHBORHOOD COUNCIL**  
P.O. Box 3395, Chatsworth, CA 91313-3395  
(818) 464-3511 [www.chatsworthcouncil.org](http://www.chatsworthcouncil.org)



Martin A. Woll, President Diana Dixon-Davis, Vice-President (Chair, Beautification) Linda Ross, Secretary Teena Takata, Treasurer  
Beatrice Berman Tita Brown Anna Cox Robert Dager Judith Daniels Jay Davis Charles Dusheck Jerry England (Chair, Equestrian; Co-Chair,  
Land Use) Allen Glazer (Chair, Outreach) Christopher Harding Daniel Huffman William Hughes (Chair, Projects) Timothy Imel (Chair,  
Transportation) Charles Knolls Arthur Schlefstein Andre van der Valk Linda van der Valk (Co-Chair, Land Use)

May 4, 2005

Planning and Land Use Committee  
City Of Los Angeles

Los Angeles LAFCO

Re: Sphere of Influence

Gentlemen,

The Land Use Committee of the Chatsworth Neighborhood Council wants to advise you that the Chatsworth Neighborhood Council is not for the above-referenced proposal.

The County has done extensive public outreach and has advised the public of its intentions for this area, as part of its general plan update, which is to generally preserve the area, with housing not to exceed one home per 10 acres.

The City has not advised us of its intentions. The City has not followed rules in its Municipal Code on certain land use matters in our Community, such as where it recently approved a 65,000 square foot storage building in a dedicated residential neighborhood. The City has not proven helpful in providing input on a recent County project near our neighborhood, but the County hosted many meetings with the developer, County Officials, and the community.

We are concerned with continued urban sprawl. We need to preserve the majority of the proposed Sphere Areas as open space, not bring them under City control to facilitate development.

We are very concerned that the City has not provided any of us with an authoritative or binding commitment on how these lands are to be used. We have been told that our Councilman has told a nearby community that the lands are to be preserved as open space; we need to see that commitment in writing through either a proposed rezoning or other clear, written, indication of the City's proposed use for this area, and public comments should be sought.

Sincerely,

Teena Takata

enclosure

At its February 2, 2005 meeting, the Board of the Chatsworth Neighborhood Council (CNC) voted unanimously to adopt the following position concerning the City's proposed Sphere-of-Influence filing with the Local Area Formation Commission (LAFCO).

The CNC is concerned that the Sphere-of-Influence Proposal to be submitted to LAFCO would, in the long run, facilitate development of unincorporated areas that should remain as open space for wildlife corridors, natural landscape and passive recreational uses.

We understand that the technical effect of a sphere of influence is merely to designate the jurisdiction which will serve as the primary source for supplying future infrastructure to an area. However, such infrastructure development tends to enable and promote more intense uses of the land in the subject area. For example, a currently proposed project along Browns Canyon Road depends in part on access to the L.A. City water supply, sewer, utility systems and roads. Annexation of the area, a reasonable consequence of a sphere-of-influence finding, would facilitate such access and hasten development.

A stated purpose for the proposal is to give the City greater standing in matters involving proposed developments in the adjacent unincorporated areas. However, in the recent Deerlake Ranch subdivision case before the County Regional Planning Commission, the City squandered ample opportunities to insist on stricter traffic mitigation and environmental protection, leaving it up to local residents to do the research and fight the battles. The City failed to provide any testimony about project impacts at various meetings of the County's Regional Planning Commission, even when its representatives were directly asked for their comments at a public hearing. If the City can't make good use of the influence it already has, it does not appear that further granting of official standing will serve any beneficial purpose.

The CNC concludes that a Sphere of Influence is not needed. Rather, the City should discourage urban sprawl and focus on redevelopment of underutilized and/or abandoned areas. In addition, we suggest that the City adopt the County's proposed Significant Ecological Area (SEA) standards in the hillside areas surrounding Chatsworth. Those proposed standards have undergone an extensive public review and comment process.

## CITY OF LOS ANGELES SPEAKER CARD

Date 5-4-05

Council File No., Agenda Item, or Case No.

#3

I wish to speak before the

Name of City Agency, Department, Committee or Council

Planning and Land Use Management Committee

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda? ☒ For proposal☐ Against proposal☐ General comments

Name: Kim Thompson

Business or Organization Affiliation:

Granada Hills North Neighborhood Council

Address:

11862 Balboa Blvd. #137 Granada Hills 91344

Business phone:

818 360 4346

Representing:

CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW:

Client Name:

Phone #:

Client Address:

Street

City

State

Zip

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## CITY OF LOS ANGELES SPEAKER CARD

Date

05/04/05

Council File No., Agenda Item, or Case No.

3

I wish to speak before the

Name of City Agency, Department, Committee or Council

Planning &amp; Use Management Cmte

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda? ☒ For proposal☐ Against proposal☐ General comments

Name: Bart Reed

Business or Organization Affiliation:

Sierra Club / Transit Coalition

Address:

12463 Tel Fair Ave Sylmar CA 91342

Business phone:

818 367-1661

Representing:

self

CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW:

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Phone #:

Client Address:

Street

City

State

Zip

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## CITY F LOS ANGELES SPEAKER ARD

Date

5-305

Council File No., Agenda Item, or Case No.

3

I wish to speak before the

Planning & Land Use  
Name of City Agency, Department, Committee or Council

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda?

- ☒ For proposal  
☐ Against proposal  
☐ General comments

Name:

Bart Reed

Business or Organization Affiliation:

Sierra Club and Transit Coalition

Address:

12463

Street

City

State

Zip

Business phone:

Representing:

CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW:

☐

Client Name:

Phone #:

Client Address:

Street

City

State

Zip

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## CITY F LOS ANGELES SPEAKER ARD

✓

Date

5/4/05

Council File No., Agenda Item, or Case No.

3

I wish to speak before the

PLUM  
Name of City Agency, Department, Committee or Council

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda?

- ☒ For proposal  
☐ Against proposal  
☐ General comments

Name:

STEVEN ADRIAT

Business or Organization Affiliation:

Address:

Street

City

State

Zip

Business phone:

Representing:

CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW:

☒

Client Name:

City of Santa Clarita

Phone #:

Client Address:

Street

City

State

Zip

Please see reverse of card for important information and submit this entire card to the presiding officer or chairperson.

## CITY OF LOS ANGELES SPEAKER CARD

Date

5-4-05

Council File No., Agenda Item, or Case No.

3

I wish to speak before the Plum Committee  
 Name of City Agency, Department, Committee or Council

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda? ☒ For proposal  
☐ Against proposal  
☐ General comments

Name: Kai LuomaBusiness or Organization Affiliation: City of Santa Clarita

Address: 23920 Valencia Bl Santa Clarita CA 91355  
 Street City State Zip

Business phone: 661-255-4330 Representing: \_\_\_\_\_CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW: ☐

Client Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

Client Address: \_\_\_\_\_  
 Street City State Zip

Please see reverse of card for important information and submit this entire card to the presiding officer or chairperson.

## CITY OF LOS ANGELES SPEAKER CARD

Date

May 4 2005

Council File No., Agenda Item, or Case No.

#3

I wish to speak before the Planning & Land Use Manag. Com  
 Name of City Agency, Department, Committee or Council

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda? ☐ For proposal  
☐ Against proposal  
☐ General comments

Name: Seannie PlunkBusiness or Organization Affiliation: Save Chatsworth, Inc.

Address: 21704 Devonshire St. Chats. Calif 91311  
 Street City State Zip

Business phone: \_\_\_\_\_ Representing: \_\_\_\_\_

CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW: ☐

Client Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

Client Address: \_\_\_\_\_  
 Street City State Zip

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## CITY OF LOS ANGELES SPEAKER CARD

Date

3/4/05

Council File No., Agenda Item, or Case No.

#13

I wish to speak before the

PLUM

Name of City Agency, Department, Committee or Council

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda? ( ) For proposal

Name: MILTON B. GUFFMAN ( ) Against proposal ( ) General comments

Business or Organization Affiliation: CAMELOT RIDING CLUB

Address: 22945 CULTRANE AVE CA 91324

Street

City

State

Zip

Business phone: 818 304 389 Representing: SELF

CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW:

☐

Client Name: Phone #:

Client Address: Street City State Zip

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## CITY OF LOS ANGELES SPEAKER CARD

Date

Council File No., Agenda Item, or Case No.

#7

I wish to speak before the

Planning and Land Use Management Comm.

Name of City Agency, Department, Committee or Council

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda? ( ) For proposal

Name: STEVEN W. WESTON (X) Against proposal ( ) General comments

Business or Organization Affiliation: WESTON BEACHHOOF

Address: 333 S Hope St 16TH FL LA CA 90071

Street

City

State

Zip

Business phone: 213-576-1000 Representing: Las Lomas Land Co.

CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW:

☒

Client Name: Las Lomas Land Co. Phone #: 310-576-6700

Client Address: 233 Wilshire Santa Monica CA 90401

Street

City

State

Zip

Please see reverse of card for important information and submit this entire card to the presiding officer or chairperson.

## CITY OF LOS ANGELES SPEAKER CARD

Date

5/5/05

Council File No., Agenda Item, or Case No.

Agenda Item #3

I wish to speak before the

PLUM Committee

Name of City Agency, Department, Committee or Council

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda? ( ) For proposal

☒ Against proposal

Name: CARLYLE HALL ( ) General comments

Business or Organization Affiliation: Alvin Gump Strauss Hauer &amp; Feld

Address: 2029 Century Park East #2400 LA Calif 90067

Business phone: (310) 728-3242 Representing: Las Lomas Land Company

CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW:

Client Name: Las Lomas Land Company Phone #: 310 576-6700

Client Address: 233 Wilshire Blvd Santa Monica CA 90401

Please see reverse of card for important information and submit this entire card to the presiding officer or chairperson.

## CITY OF LOS ANGELES SPEAKER CARD

Date

May 4, 2005

Council File No., Agenda Item, or Case No.

PLUM #3

I wish to speak before the

PLUM

Name of City Agency, Department, Committee or Council

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda? ( ) For proposal

☒ Against proposal

Name: Jerry Neuman ( ) General comments

Business or Organization Affiliation: Allen Matkins

Address: 515 S. Figueroa St LA CA 90004

Business phone: 213-622-5555 Representing: Las Lomas Land Co

CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW:

Client Name: Las Lomas Land Company Phone #: 310-576-6700

Client Address: 233 Wilshire Santa Monica CA 90401

Please see reverse of card for important information and submit this entire card to the presiding officer or chairperson.

## CITY : LOS ANGELES SPEAKER : RD

Date

5-4-05

Council File No., Agenda Item, or Case No.

05-671 #3

I wish to speak before the

PLANNING, LAND USE MANAGEMENT COMMITTEE  
Name of City Agency, Department, Committee or Council

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda? ( ) For proposal

(X) Against proposal

( ) General comments

Name:

WARREN STONE

Business or Organization Affiliation:

TWIN LAKE PROPERTY ASSOC.

Address:

11416 CREE TAIL CHATSWORTH CA 91311  
Street City State Zip

Business phone:

818-999-1735

Representing:

TWIN LAKE PROPERTY ASSOC.

CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW:

☐

Client Name:

Phone #:

Client Address:

Street

City

State

Zip

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## CITY : LOS ANGELES SPEAKER : RD

Date

5/4/05

Council File No., Agenda Item, or Case No.

3

I wish to speak before the

Planning & Land Use Management Committee  
Name of City Agency, Department, Committee or Council

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda? ( ) For proposal

(X) Against proposal

( ) General comments

Name:

Teena Takata

Business or Organization Affiliation:

Chatsworth Neighborhood Council

Address:

9629 Baden Ave Chatsworth CA 91311  
Street City State Zip

Business phone:

818 703-1040

Representing:

Chatsworth Neighborhood Council

CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW:

☐

Client Name:

Phone #:

Client Address:

Street

City

State

Zip

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CITY LOS ANGELES SPEAKER RD

Date

5/4/2005

Council File No., Agenda Item, or Case No.

3

I wish to speak before the PLANNING AND LAND USE MANAGEMENT (PLUM)  
Name of City Agency, Department, Committee or Council

Do you wish to provide general public comment, or to speak for or against a proposal on the agenda? ( ) For proposal  
(X) Against proposal  
( ) General comments

Name: HILARY NORTON OROZCO

Business or Organization Affiliation: PALMER INVESTMENTS

Address: 233 WILSHIRE BOULEVARD SANTA MONICA CA 90401  
Street City State Zip

Business phone: (310) 576-6700 Representing: LAS VEGAS

CHECK HERE IF YOU ARE A PAID SPEAKER AND PROVIDE CLIENT INFORMATION BELOW: ☐

Client Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

Client Address: \_\_\_\_\_  
Street City State Zip

Please see reverse of card for important information and submit this entire card to the presiding officer or chairperson.

## Councilman Smith's comments

LA Sphere of Influence Change  
Item #3 – PLUM – May 4, 2005

### Introduction:

The establishment of a Sphere of Influence is **not** a land use, project sensitive, action— But rather, a tool to protect the interest of the city of LA as it relates to land use in unincorporated areas of the county along our borders.

The action before you was taken in response to an action taken by the City of Santa Clarita in 2000. That action would have allowed Santa Clarita to have a say in land use all the way to the LA border in the 5/14 traffic corridor. Any development in this corridor, without LA input, would seriously impact our resources and traffic. To do nothing would have been contrary to the best interest of the City of LA.

### Significant Issues:

- All of this took place **prior** to the Las Lomas project being filed with the city.
- Las Lomas, as a project, was filed in June, 2002. At that time, the city attorney advised that the City of LA must process the EIR without prejudice, and that the decision on Las Lomas can only be made after the proper CEQA process.
- There are claims by proponents of Las Lomas that the SOI is in reaction to-- and designed to stop-- Las Lomas. Legally, that is not possible.

LAFCO **cannot** consider land uses as part of the SOI process!

- LAFCO rules, as defined by the Cortese-Knox State Law 56076, does not allow zoning projects as part of a SOI and considers a SOI as **not a project**, therefore CEQA exempt.
- In the legal document presented by the proponents of Las Lomas, they claim the court overturned Santa Clarita actions over Las Lomas because of the use of a negative declaration. Actually, Santa Clarita lost because it pre-zoned Las Lomas without a CEQA process. LA is **not** making the same mistake!
- The map included in your packet that shows Las Lomas is for information purposes only. The final map which will go to Council and then to LAFCO cannot and does not show Las Lomas, because we are **not** dealing with it in the SOI context. The official map is here today.
- Finally, I must reiterate---the SOI deals with large areas on our city's border. Even if Las Lomas factored into this SOI—which it does not—it would only be 1% of the discussion.
  - The SOI was brought forward 2 full years before Las Lomas
  - It will give the City of LA a stronger position and seat at the table in any land use

- case in county unincorporated areas where we currently have no legal standing.
- Moving forward today gives LA more say in these identified areas.
  - An SOI does not allow LA City to promote building in these areas.
  - Any discussion of Las Lomas is not legally allowed as part of the SOI. LAFCO cannot consider Las Lomas in this context.
  - The entire package before you today follows the recommendations made consistently by our City Attorney on how to proceed..

I urge your approval today.

**Mr. Mike Davis  
Transcoast Financial  
8405 Pershing Drive  
Suite 301  
Playa Del Rey, CA 90293-7894**

**May 3, 2005**

**Honorable Eduardo Reyes  
Councilmember  
Chair, Planning and Land Use Committee (PLUM)  
200 North Spring Street  
Los Angeles, CA 90012**

**Re: Sphere of Influence Amendment, May 4, 2005 PLUM Agenda Item No. 3**

**Dear Councilmember Reyes:**

We are the owners of the property indicated on the proposed City of Los Angeles ("City") Sphere of Influence ("SOI") amendment as the Las Lomas project. We are writing to you because of our concern that the action to be taken by PLUM and thereafter the City Council of the City of Los Angeles to approve the proposed SOI amendment would severely prejudice any project which could be developed on our property as well as substantially diminish the value of our land.

As you are aware, we have collectively agreed to sell our properties to the Las Lomas Land Company ("LLLC") for development of the Las Lomas project. We have been working with LLLC to assist in the application and entitlement process for the Las Lomas project in the City. We have also been before the Local Agency Formation Commission to communicate our desire not to be included in any sphere of influence amendment or annexation by the City of Santa Clarita, and have commenced a process with the County of Los Angeles to consolidate our properties into one legal parcel in order to insure that our interests are evaluated collectively and not on a property by property basis.

The value of our property is directly linked to the ability to obtain vital resources such as water and power which is only available on an extremely limited basis from either the city of Santa Clarita or Los Angeles County. For this reason, we are steadfast and resolute in our intention to annex our properties into the City of Los Angeles which has already indicated its ability to provide adequate resources for development purposes.

We believe that any action taken with regard to our properties prior to a full review and analysis of the Las Lomas project and consideration of our request to annex into the City of Los Angeles would prejudice the outcome of our request and severely prejudice our ability to gain a fair hearing on the matters we have put before the City. Additionally, we do not understand how the City can undertake to impact our properties in this manner on the basis of a negative declaration when at the same time it is processing a full environmental impact report concerning

05/03/2005 15:53 FAX 310 576 0888

PALMER INVESTMENTS, INC.

003/003

these same properties. In our view, the negative declaration proposed for your action is woefully inadequate in describing the impact to our properties and the environment which would result from the expansion of the City's sphere of influence in the manner described.

Finally, we are most outraged by the fact that the action you are proposing to undertake is being done pursuant to a "backroom" deal which has been reached between the City of Los Angeles and the City of Santa Clarita as has been reported in both the Daily News and the Los Angeles Times. We believe it is reprehensible for any government agency to act in such an underhanded manner as to attempt to deny the rights of property owners without allowing them to be heard on the merits of their case or to afford them due process prior to predetermining the outcome of their request.

In this regard, we ask that you disregard the backroom deal and either amend the proposal to include all of our properties as we have requested or exclude all of our properties from the proposed SOI until such time as the Las Lomas project is heard on its merits.

Thank you for your consideration.

Sincerely,

Transcoast Financial, Inc.,  
a California corporation

By: 

Name: CARLYLE E. DAVIS

Title: PRESIDENT

Transcoast Properties, Inc.,  
a California corporation

By: 

Name: CARLYLE E. DAVIS

Title: PRESIDENT

Davis Family Trust

By: 

Name: CARLYLE E. DAVIS

Title: TRUSTEE

*submitted 8-4-05  
PLM*

RESOLUTION NO. 05-39

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF  
SANTA CLARITA, CALIFORNIA, IN SUPPORT OF THE CITY OF LOS ANGELES  
AMENDMENT TO THE SPHERE OF INFLUENCE NO. CF-00-2206.

WHEREAS, on May 4, 2005 the Planning and Land Use Management Committee of the City of Los Angeles is scheduled to consider a Resolution of Application to the Los Angeles County Local Agency Formation Commission for the submittal of an application to amend the City of Los Angeles sphere of influence; and

WHEREAS, on May 6, 2005 the City Council of the City of Los Angeles is scheduled to consider a Resolution of Application to the Los Angeles Local Agency Formation Commission for the submittal of an application to amend the City of Los Angeles sphere of influence; and

WHEREAS, the proposed boundaries of the amended sphere of influence, more or less, follows the watershed ridgeline separating the watersheds of the San Fernando and Santa Clara rivers and is the physical separation of the San Fernando and Santa Clarita Valleys; and

WHEREAS, the amended sphere of influence would encourage sound planning, well-ordered urban development patterns, and a logical boundary pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (ACT).

NOW, THEREFORE, the City Council of the City of Santa Clarita does hereby resolve to take a supporting position on the proposed City of Los Angeles Sphere of Influence amendment.

The City Clerk shall certify to the adoption of this Resolution.

PASSED, APPROVED AND ADOPTED this 26<sup>th</sup> day of April, 2005.

\s\ CAMERON SMYTH

\_\_\_\_\_  
MAYOR

ATTEST:

\s\ SHARON L. DAWSON

\_\_\_\_\_  
CITY CLERK

STATE OF CALIFORNIA            )  
COUNTY OF LOS ANGELES       ) ss.  
CITY OF SANTA CLARITA        )

I, Sharon L. Dawson, CMC, City Clerk of the City of Santa Clarita, do hereby certify that the foregoing Resolution was duly adopted by the City Council of the City of Santa Clarita at a regular meeting thereof, held on the 26<sup>th</sup> day of April, 2005, by the following vote:

AYES:           COUNCILMEMBERS: McLean, Weste, Kellar, Ferry, Smyth

NOES:           COUNCILMEMBERS: None

ABSENT:        COUNCILMEMBERS: None

\s\ SHARON L. DAWSON

---

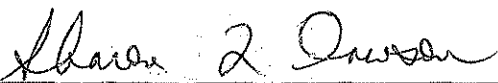
CITY CLERK

STATE OF CALIFORNIA           )  
COUNTY OF LOS ANGELES    ) ss.  
CITY OF SANTA CLARITA       )

CERTIFICATION OF  
CITY COUNCIL RESOLUTION

I, Sharon L. Dawson, City Clerk of the City of Santa Clarita, do hereby certify that this is a true and correct copy of the original Resolution No. 05-39, adopted by the City Council of the City of Santa Clarita, California on April 26, 2005, which is now on file in my office.

Witness my hand and seal of the City of Santa Clarita, California, this 3<sup>rd</sup> day of May, 2005

  
\_\_\_\_\_  
Sharon L. Dawson, CMC  
City Clerk

By \_\_\_\_\_  
Susan Coffman  
Deputy City Clerk



*submitted in  
Cmte on 5-4-05*

May 4, 2005

To whom this may concern:

My name is Manny Santana and I own various parcels of property adjacent to Mr. Dan Palmer's Development that totals over 154 acres.

These parcels are located both in Los Angeles County and in the City of Santa Clarita. I would very much like to annex all my property into the City of Los Angeles.

I'm aware the City of Santa Clarita has a sphere of influence on some of my property. In no way do I wish for them to have a sphere of influence on all of my property.

Should you have any questions, I can be reached at the following numbers:  
Pager 661-291-5945 or Cell 661-600-3344

Thank you,

*Manuel Santana, Trustee*

Manuel Santana, Trustee

05/04/2005 09:48 IFAX Recd: jniet@PalmerInvestments.com

faxes

002/009

05/03/2005 15:50 FAX 310 578 0886

PALMER INVESTMENTS, INC.

002/009

**Ms. Ghislaine Brassine  
Newhall Calgrove  
900 Corporate Center Drive  
Third Floor  
Monterey Park, California 91754**

May 3, 2005

Honorable Eduardo Reyes  
Councilmember  
Chair, Planning and Land Use Committee (PLUM)  
200 North Spring Street  
Los Angeles, CA 90012

Re: Sphere of Influence Amendment, May 4, 2005 PLUM Agenda Item No. 3

Dear Councilmember Reyes:

We are the owners of the property indicated on the proposed City of Los Angeles ("City") Sphere of Influence ("SOI") amendment as the Las Lomas project. We are writing to you because of our concern that the action to be taken by PLUM and thereafter the City Council of the City of Los Angeles to approve the proposed SOI amendment would severely prejudice any project which could be developed on our property as well as substantially diminish the value of our land.

As you are aware, we have collectively agreed to sell our properties to the Las Lomas Land Company ("LLLC") for development of the Las Lomas project. We have been working with LLLC to assist in the application and entitlement process for the Las Lomas project in the City. We have also been before the Local Agency Formation Commission to communicate our desire not to be included in any sphere of influence amendment or annexation by the City of Santa Clarita, and have commenced a process with the County of Los Angeles to consolidate our properties into one legal parcel in order to insure that our interests are evaluated collectively and not on a property by property basis.

The value of our property is directly linked to the ability to obtain vital resources such as water and power which is only available on an extremely limited basis from either the city of Santa Clarita or Los Angeles County. For this reason, we are steadfast and resolute in our intention to annex our properties into the City of Los Angeles which has already indicated its ability to provide adequate resources for development purposes.

05/04/2005 09:48 IFAX Recd nist@PalmerInvestments.com

axes

003/003

05/03/2005 15:59 FAX 310 576 0888

PALMER INVESTMENTS, INC.

003/003

We believe that any action taken with regard to our properties prior to a full review and analysis of the Las Lomas project and consideration of our request to annex into the City of Los Angeles would prejudice the outcome of our request and severely prejudice our ability to gain a fair hearing on the matters we have put before the City. Additionally, we do not understand how the City can undertake to impact our properties in this manner on the basis of a negative declaration when at the same time it is processing a full environmental impact report concerning these same properties. In our view, the negative declaration proposed for your action is woefully inadequate in describing the impact to our properties and the environment which would result from the expansion of the City's sphere of influence in the manner described.

Finally, we are most outraged by the fact that the action you are proposing to undertake is being done pursuant to a "backroom" deal which has been reached between the City of Los Angeles and the City of Santa Clarita as has been reported in both the Daily News and the Los Angeles Times. We believe it is reprehensible for any government agency to act in such an underhanded manner as to attempt to deny the rights of property owners without allowing them to be heard on the merits of their case or to afford them due process prior to predetermining the outcome of their request.

In this regard, we ask that you disregard the backroom deal and either amend the proposal to include all of our properties as we have requested or exclude all of our properties from the proposed SOI until such time as the Las Lomas project is heard on its merits.

Thank you for your consideration.

Sincerely,

Newhall Calgrove Estates  
A California limited partnership

By:   
Ghislaine G. Bassine-Manchan  
General Partner

05/04/2005 10:18 FAX 310 578 08

PALMER INVESTMENTS, INC.

004/005

05/04/2005 09:08 IFAX Recep palmer@PalmerInvestments.com

axes

001/002

FROM : GOFFMAN/ CAMELOT RIDING CLUB  
05/03/2005 18 02 FAX 310 516 0938

FAX NO. : 818 360 2332  
PALMER INVESTMENTS, INC

May. 04 2005 09:07AM P1  
002/000

Mr. and Mrs. Milton B. Goffman  
18962 Harnett Street  
Northridge, California 90293

May 3, 2005

Honorable Eduardo Reyes  
Councilmember  
Chair, Planning and Land Use Committee (PLUM)  
200 North Spring Street  
Los Angeles, CA 90012

Re: Sphere of Influence Amendment, May 4, 2005 PLUM Agenda Item No. 3

Dear Councilmember Reyes:

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05/04/2005 10:18 FAX 310 578 08

PALMER INVESTMENTS, INC.

005/005

05/04/2005 09:08 IFAX Recep hst@PalmerInvestments.com

axes

002/002

FROM : GOFFMAN/ CAMELOT RIDING CLUB FAX NO. : 818 360 2332  
05/03/2005 10 00 FAX 310 570 0830 PALMER INVESTMENTS, INC.

May. 04 2005 09:07AM P2  
003/003

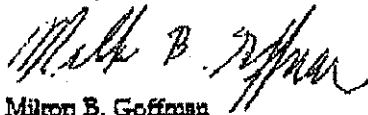
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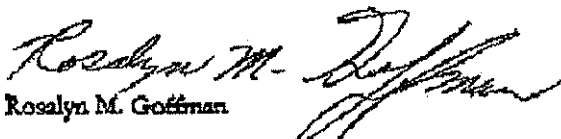
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Thank you for your consideration.

Sincerely,

  
Milton B. Goffman

  
Rosalyn M. Goffman

**Carole Bergin  
5216 Corteen Place, Apt. 17  
Valley Village, CA 91607  
(818)761-8425**

May 3, 2005

Honorable Eduardo Reyes  
Councilmember  
Chair, Planning and Land Use Committee (PLUM)  
200 North Spring Street  
Los Angeles, CA 90012

Re: Sphere of Influence Amendment, May 4, 2005 PLUM Agenda Item No. 3

Dear Councilmember Reyes:

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In this regard, we ask that you disregard the backroom deal and either amend the proposal to include all of our properties as we have requested or exclude all of our properties from the proposed SOI until such time as the Las Lomas project is heard on its merits.

Thank you for your consideration.

Sincerely,



Carole Bergin



May 2, 2005

Susan Whisnant  
Los Angeles Department of City Planning  
6262 Van Nuys Boulevard, Room 351  
Van Nuys, CA 90401

Re: Proposed Negative Declaration ENV-204-7108: CF-00-2206  
North San Fernando Valley Sphere of Influence Amendment

Dear Ms. Whisnant:

After reviewing the April 6, 2004 report regarding the proposed amendment to expand the boundaries of the City Sphere of Influence, Save Chatsworth first would like to clarify whether or not the City intends this expansion as a precursor to annexation of the subject areas. Annexation by the City is generally perceived as a promotion of urbanization.

Save Chatsworth, a coalition of community organizations and concerned citizens, supports the position (letter dated December 27, 2004) of the Neighborhood Councils of Chatsworth, Porter Ranch, Foothill Trails District, Sunland Tujunga, Sylmar and West Hills, and also the position of the Santa Monica Mountains Conservancy (letter dated January 24, 2005), and recommends that the City respect the parameters of the proposed SEA (significant ecological area) as outlined in the updated Los Angeles County General Plan. What is the City's commitment to the preservation of areas already designated as open space? Save Chatsworth believes that all designated open space areas within any proposed expansion of the Sphere of Influence should remain as such, and that new development in the foothill areas should be severely curtailed, due to ever-increasing impacts on traffic situations already impossible to fully mitigate, and the effects on the environment.

The City Planning Department's report of April 6, 2005 states that one of the issues supporting the proposed expansion of the Sphere of Influence is the preservation of the Los Angeles River. As we agree that the protection of the Los Angeles River Watershed is of vital importance, we would welcome specific information as to what additional storm water management mitigation measures the City would require beyond what is currently the standard for Los Angeles County.

Expansion of the City's service area could lead to more development. Save Chatsworth and the Chatsworth community have clearly stated their case regarding development through their lengthy struggle opposing the density of the recently approved Deerlake Ranch development project. The Save Chatsworth organization seeks to preserve the rural, equestrian lifestyle unique to communities such as Chatsworth, to protect distinctive geographic features and natural topography, and to promote responsible development.

Most sincerely,

Vanessa Watters  
President, Save Chatsworth

cc: Con Howe, Director of Planning, Los Angeles Department of City Planning  
Members of the Planning and Land Use Management Committee





## CHATSWORTH NEIGHBORHOOD COUNCIL

P.O. Box 3395, Chatsworth, CA 91313-3395

(818) 464-3511 [www.chatsworthcouncil.org](http://www.chatsworthcouncil.org)



Martin A. Woll, President Diana Dixon-Davis, Vice-President (Chair, Beautification) Linda Ross, Secretary Teena Takata, Treasurer  
Beatrice Berman Tita Brown Anna Cox Robert Dager Judith Daniels Jay Davis Charles Dusheck Jerry England (Chair, Equestrian; Co-Chair,  
Land Use) Allen Glazer (Chair, Outreach) Christopher Harding Daniel Huffman William Hughes (Chair, Projects) Timothy Imel (Chair,  
Transportation) Charles Knolls Arthur Schlefstein Andre van der Valk Linda van der Valk (Co-Chair, Land Use)

May 4, 2005

Planning and Land Use Committee  
City Of Los Angeles

Los Angeles LAFCO

Re: Sphere of Influence

Gentlemen,

The Land Use Committee of the Chatsworth Neighborhood Council wants to advise you that the Chatsworth Neighborhood Council is not for the above-referenced proposal.

The County has done extensive public outreach and has advised the public of its intentions for this area, as part of its general plan update, which is to generally preserve the area, with housing not to exceed one home per 10 acres.

The City has not advised us of its intentions. The City has not followed rules in its Municipal Code on certain land use matters in our Community, such as where it recently approved a 65,000 square foot storage building in a dedicated residential neighborhood. The City has not proven helpful in providing input on a recent County project near our neighborhood, but the County hosted many meetings with the developer, County Officials, and the community.

We are concerned with continued urban sprawl. We need to preserve the majority of the proposed Sphere Areas as open space, not bring them under City control to facilitate development.

We are very concerned that the City has not provided any of us with an authoritative or binding commitment on how these lands are to be used. We have been told that our Councilman has told a nearby community that the lands are to be preserved as open space; we need to see that commitment in writing through either a proposed rezoning or other clear, written, indication of the City's proposed use for this area, and public comments should be sought.

Sincerely,

Teena Takata

enclosure

At its February 2, 2005 meeting, the Board of the Chatsworth Neighborhood Council (CNC) voted unanimously to adopt the following position concerning the City's proposed Sphere-of-Influence filing with the Local Area Formation Commission (LAFCO).

The CNC is concerned that the Sphere-of-Influence Proposal to be submitted to LAFCO would, in the long run, facilitate development of unincorporated areas that should remain as open space for wildlife corridors, natural landscape and passive recreational uses.

We understand that the technical effect of a sphere of influence is merely to designate the jurisdiction which will serve as the primary source for supplying future infrastructure to an area. However, such infrastructure development tends to enable and promote more intense uses of the land in the subject area. For example, a currently proposed project along Browns Canyon Road depends in part on access to the L.A. City water supply, sewer, utility systems and roads. Annexation of the area, a reasonable consequence of a sphere-of-influence finding, would facilitate such access and hasten development.

A stated purpose for the proposal is to give the City greater standing in matters involving proposed developments in the adjacent unincorporated areas. However, in the recent Deerlake Ranch subdivision case before the County Regional Planning Commission, the City squandered ample opportunities to insist on stricter traffic mitigation and environmental protection, leaving it up to local residents to do the research and fight the battles. The City failed to provide any testimony about project impacts at various meetings of the County's Regional Planning Commission, even when its representatives were directly asked for their comments at a public hearing. If the City can't make good use of the influence it already has, it does not appear that further granting of official standing will serve any beneficial purpose.

The CNC concludes that a Sphere of Influence is not needed. Rather, the City should discourage urban sprawl and focus on redevelopment of underutilized and/or abandoned areas. In addition, we suggest that the City adopt the County's proposed Significant Ecological Area (SEA) standards in the hillside areas surrounding Chatsworth. Those proposed standards have undergone an extensive public review and comment process.

AKIN GUMP  
STRAUSS HAUER & FELD LLP

Attorneys at Law

#3  
CARLYLE W. HALL, JR.  
tel: 310.728.3242  
fax: 310.728.2242  
cwhall@akingump.com

May 3, 2005

**VIA HAND DELIVERY**

Los Angeles City Council  
City of Los Angeles  
City Hall, 200 N. Spring Street  
Los Angeles, CA 90012

Re: Amendment to Sphere of Influence Plan Boundaries -- CF-00-2206

Dear Council Members:

This firm represents the Las Lomas Land Company ("Las Lomas"), developer of the Las Lomas Specific Plan project (the "Las Lomas Project"), which proposes annexation of the Project area into the City of Los Angeles. The 555-acre Las Lomas Project site is situated in presently unincorporated territory between the City of Santa Clarita to the north and the City of Los Angeles to the south.

During 2003-2004, this firm also represented Las Lomas in a Superior Court lawsuit brought by Las Lomas under the California Environmental Quality Act ("CEQA") successfully challenging certain discretionary actions by Santa Clarita. These disputed actions -- approvals for a proposed Sphere of Influence Plan Amendment, an Annexation and a Pre-zoning -- were designed to initiate and implement Santa Clarita's control over the Las Lomas Project area. That CEQA litigation resulted in the Superior Court's April 13, 2004 writ of mandate ordering Santa Clarita to set aside its discretionary actions, because Santa Clarita had improperly approved those actions based on a mere Negative Declaration ("ND"). The Superior Court specifically ordered Santa Clarita to prepare a full Environmental Impact Report ("EIR") in any further processing of discretionary actions seeking to gain control and authority over the Las Lomas Project area. Santa Clarita did not appeal the Superior Court's ruling.

As described below, Las Lomas began processing entitlements for its mixed-use development project with the City of Los Angeles in June 2002, and, while receiving payment of its direct processing costs by Las Lomas, Los Angeles has commenced preparation of a full EIR for that project. With Santa Clarita's effort to annex the Project area defeated by the Superior Court's ruling, Las Lomas has anticipated that Los Angeles will proceed to complete the Project EIR and consider the Las Lomas Project development proposal based on the EIR's comprehensive environmental data and analysis. A Draft EIR should be ready for public

Los Angeles City Council  
May 3, 2005  
Page 2

circulation soon. Unfortunately, however, Los Angeles now proposes, in connection with the instant area-wide sphere of influence plan amendment application (CF-00-2206), to prematurely initiate proceedings to obtain jurisdiction and control over only a portion of the Las Lomas Project area, before the Las Lomas Project EIR's environmental data and analysis is available.

Las Lomas believes that Los Angeles' ND for its proposed sphere of influence action is legally deficient, at least as it relates to the Las Lomas Project area. In order to avoid litigation over Los Angeles' currently defective CEQA compliance, Las Lomas proposes that Los Angeles should now approve either of two alternative courses of action. Under one approach, Los Angeles would include none of the Project area within the proposed Los Angeles sphere of influence. Under this approach, important decisions about the future jurisdictional control over, and development of, the Las Lomas Project area would be made only after all appropriate environmental data has been gathered and after full CEQA analysis has been completed with respect to the proposed development site. They would not be made prematurely at substantial prejudice to Las Lomas. Under the second approach, Los Angeles would place all of the Project area into Los Angeles' proposed sphere of influence, so that Las Lomas can continue efficiently planning its Project infrastructure requirements and appropriate mitigation measures. Because this second approach is consistent with Las Lomas' application for Project entitlements, Las Lomas would not object to this second approach.

This letter first briefly describes the pending Las Lomas Project application and the EIR being prepared for it; Santa Clarita's unsuccessful efforts to initiate proceedings to assume jurisdictional control regarding the Project area; the Superior Court's rulings nullifying Santa Clarita's actions; and Los Angeles' currently pending proposed sphere of influence action. It then explains why sphere of influence plan decisions raise important environmental issues that necessitate CEQA compliance. Last, it shows why the current ND for the pending Los Angeles sphere of influence action is legally defective and prejudicial to Las Lomas, and it recommends alternative courses of action that Los Angeles may follow.

## BACKGROUND

### **A. In Mid-2002, Los Angeles Launched Administrative Proceedings by Which It Would Potentially Gain Control over the Entire Las Lomas Project Area and Would Determine Appropriate Development Entitlements.**

In June 2002, Los Angeles circulated a Notice of Preparation ("NOP") of an EIR for the Las Lomas Project. The NOP plainly indicated that Las Lomas was requesting, *inter alia*, the following discretionary actions by Los Angeles: Sphere of Influence Plan Amendment, Annexation, General Plan Amendment, Zone Change and Specific Plan approval. Through these

Los Angeles City Council  
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requested discretionary actions, Los Angeles would first gain control over the Las Lomas Project area, and then would provide entitlements for a requested mixed-use project for 5,800 dwelling units, 2.3 million square feet of office/research and development, a 300-room hotel, 225,000 square feet of retail uses, 250,000 square feet of community facilities (including public schools), and 285 acres of open space. (See Exhibit A – Los Angeles' June 27, 2002 NOP materials.)

Responding to the NOP, Santa Clarita submitted detailed comments demanding that Los Angeles' EIR evaluate a host of environmental issues. The Santa Clarita City Council then adopted a resolution proclaiming that "any development in the Las Lomas Project area will have a significant environmental impact..." and alleged, among other matters, that any development could result in potentially significant impacts to the subject parcel's Significant Ecological Area and its wildlife corridor resources, cultural resources, wetlands, steep slopes, earthquake fault lines and wildland fire hazard areas. (See Exhibit B – Santa Clarita's August 9, 2002 comments on Los Angeles' NOP, Exhibit C – Santa Clarita City Council Resolution No. 02-175 dated December 10, 2002.)

**B. In Late-2002, Santa Clarita Launched Rival Administrative Proceedings to Implement Its Own Proposal to Gain Control Over the Las Lomas Project Area.**

In December 2002, Santa Clarita decided that it would like to gain control over the Las Lomas Project area and downzone it dramatically, thereby preventing anything close to the intensity of development proposed by Las Lomas. Accordingly, Santa Clarita proposed to undertake the following discretionary actions: a Sphere of Influence Plan Amendment, an Annexation and a Pre-zone. (See Exhibit D – Santa Clarita's December 17, 2002 ND, at p. 1, 2 [providing its proposed project description including a sphere of influence plan amendment].) These actions would encompass an 825-acre area that included the proposed 555-acre Las Lomas Project parcel. (See Exhibit E – Santa Clarita Planning and Building Services' December 10, 2002 agenda report to the City Council, at pp. 1-2, 5; see also Exhibit D, at p. 2.) Repudiating its own earlier representations that any development within the Las Lomas Project area would necessarily have significant environmental impacts, Santa Clarita proposed to take these discretionary actions based on a mere ND, rather than a full EIR. In fact, Santa Clarita's ND repeatedly took the position that its effort to gain control over the Las Lomas Project area was not "linked" to any particular development proposal; that Las Lomas' development proposal pending before the Los Angeles decision-makers was purely speculative; and that, absent a particular development proposal by Las Lomas to Santa Clarita, no development at the site was "reasonably foreseeable" and, consequently, no impacts of such development had to be evaluated. (See Exhibit F – Santa Clarita's February 4, 2003 ND.)

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For its part, Las Lomas duly informed Santa Clarita that it “intends to promptly and diligently develop the Las Lomas site regardless of what jurisdiction may govern the site.... Consequently, site development is not only foreseeable, it is imminent.” (See Exhibit G – February 25, 2003 comment letter from Allen Matkins, on behalf of Las Lomas, regarding Santa Clarita’s proposed ND.) Nonetheless, on February 25, 2003, Santa Clarita approved the proposed discretionary actions based on its mere ND, and forthwith presented its actions to the Los Angeles County Local Agency Formation Commission (“LAFCo”) for that agency’s consideration and approval.

**C. In the 2003-2004 CEQA Litigation Proceedings, the Superior Court Nullified Santa Clarita’s Actions and Ruled that Santa Clarita Must Prepare a Full EIR Before Re-initiating Any Further Efforts to Control the Las Lomas Project Area.**

Throughout the ensuing CEQA litigation, Las Lomas argued to the Superior Court that Santa Clarita’s abbreviated ND took a prohibited “piecemeal” approach toward the Las Lomas Project. Rather than looking at “the whole of the action” and preparing an EIR “at the earliest stage,” as CEQA requires, Santa Clarita proposed “chopping a large project into many little ones – each with a minimal potential impact on the environment” in order to avoid full environmental review through an EIR. (See Exhibit H – excerpts from Las Lomas’ Opening Brief, citing, *inter alia*, *Bozung v. Ventura County LAFCo* (1975) 13 Cal.3d 263 and *Rural Landowners Ass’n v. Lodi City Council* (1983) 143 Cal.App.3d 1013.) As Las Lomas argued, Santa Clarita could not “de-link” its proposed discretionary approvals seeking jurisdiction and control over the subject parcel from Las Lomas’ pending development proposals, because the Las Lomas Project, or an alternative development configuration, is reasonably foreseeable, irrespective of which jurisdiction ultimately gains control over the Project area. (See *id.* at pp. 14 to 21.) (Las Lomas hereby incorporates by reference the entire administrative record and court file from the 2003-2004 CEQA litigation proceedings.)

Superior Court Judge Dzintra Janavs agreed entirely with these CEQA arguments put forward by Las Lomas. The Court’s April 13, 2004 Statement of Decision ruled that the administrative record contained “substantial evidence to support a fair argument that [Santa Clarita’s] actions may have significant environmental impacts.” As Judge Janavs noted, future development of the site by Las Lomas was, in fact, “reasonably foreseeable” no matter which jurisdiction ultimately gained control over the subject parcel. Further, Santa Clarita had explicitly conceded that “any development in the Las Lomas Project area will have a significant environmental impact,” and Santa Clarita’s comments on Los Angeles’ NOP had enumerated an extensive list of potential environmental impacts. (See Exhibit I – the Superior Court’s April 13, 2004 Statement of Decision, at p. 3.)

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Judge Janavs therefore mandated Santa Clarita to set aside its February 2003 discretionary approvals seeking jurisdiction and control over the Las Lomas Project site, and ordered Santa Clarita to prepare a full EIR "in any subsequent processing" of those discretionary approvals. (See Exhibit J – Final Judgment and Writ of Mandate.)

**D. In 2002-2005, Los Angeles Undertook Processing of its Presently Pending Area-wide Sphere of Influence Plan Amendment Application.**

Meanwhile, in November 2002, Los Angeles began processing an area-wide Sphere of Influence Plan Amendment Application (sometimes referred to as the "Sphere of Influence Application") that would encompass the remaining unincorporated areas of the San Fernando Valley within Los Angeles' sphere of influence. (See Exhibit K – November 14, 2000 Los Angeles City Council motion.) As recently released to the public, this Los Angeles Sphere of Influence Application would encompass fully 19,242 acres, or slightly more than 30 square miles. According to the Los Angeles Planning Department's April 6, 2005 report, the proposed sphere of influence boundaries would generally "follow the natural ridgeline of the San Gabriel and Santa Susana Mountains, so that the Los Angeles River watershed generally would be placed into Los Angeles' sphere of influence." (See Exhibit L – April 6, 2005 Staff Report and ND, at p. 2.)

Los Angeles has recently prepared an environmental document for this proposed Sphere of Influence Application. The environmental document characterizes itself as a "Mitigated Negative Declaration" ("MND"), not a mere ND, while obscurely referring to certain unidentified "mitigation measure(s) outlined on the attached page(s)" that supposedly would "reduce any potential significant adverse effects" from the proposed Sphere of Influence Application "to a level of insignificance." Despite this "finding," however, no mitigation measures are listed or discussed in the attached pages, and the environmental document for the Sphere of Influence Application appears to be a mere ND, not an MND. Furthermore, with respect to the Las Lomas Project area, neither the Los Angeles staff report nor the environmental document explains the reasons for the location of the proposed sphere of influence boundary line within the Las Lomas Project area. It appears from the map attached to the ND, that, where the line crosses the Las Lomas Project area, it vaguely approximates in some ways the ridgeline, although that is far from clear, and the Project area appears to be divided so that about 25 to 30 percent would be within Los Angeles' proposed boundaries. (See *id.* at p. 10.)<sup>1</sup>

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<sup>1</sup> Although the Los Angeles Planning Department's staff report prepared in connection with its pending Spheres of Influence Amendment Application specifically identifies the Las Lomas Project area,

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Importantly, a December 15, 2004 front-page news article in the *Daily News* reports that certain Santa Clarita and Los Angeles officials have held a series of behind-closed-doors meetings and “quietly cut a deal” that would split the Las Lomas Project area between the two cities. According to the *Daily News* article, under this backroom deal, a new sphere of influence line was to be drawn between the two cities so that Los Angeles would obtain approximately 25 percent of the Project area and Santa Clarita would obtain approximately 75 percent. The article further describes how the proposed sphere of influence boundaries would be designed to block the Las Lomas Project by making development of the Project area far more difficult. (See Exhibit M – December 15, 2005 *Daily News* article.)

**E. Santa Clarita Has Now Begun Processing Its Own Las Lomas Project Parcel-Specific Sphere of Influence Application.**

Not surprisingly, given the December 15<sup>th</sup> *Daily News* article, Santa Clarita also now proposes to extend its own sphere of influence southward within the Las Lomas Project parcel. According to Santa Clarita’s recently released April 8, 2005 ND, Santa Clarita is now processing a 595-acre parcel-specific Sphere of Influence Application that would essentially complete the other side of the *Daily News*-reported “back-room deal.” The area in question includes the majority of the Las Lomas Project area, over which Santa Clarita had previously sought to extend its sphere of influence, annex and pre-zone, based on a mere ND (*i.e.*, the February 2003 ND invalidated by Judge Janavs), instead of a full EIR. Yet Santa Clarita’s current ND does not even mention the Superior Court’s order commanding it to prepare a full EIR, as required by CEQA. Nor does Santa Clarita attempt to develop a new approach or a new rationale for its proposed sphere of influence action over the Las Lomas Project area based on a mere ND. The reader of the ND perceives an unfortunate sense of *déjà vu*, encountering the same previously rejected rationale that the proposed sphere of influence plan amendment action initiating Santa Clarita’s jurisdictional control over the subject area “is not related to any proposed development on the site.” (See Exhibit N – Santa Clarita’s April 8, 2005 ND, at pp. 8, 9, 10, 26, 27, 28, 29, 30, 32, 33, 35, 36, 37.)

**I. The Determination of Boundary Lines for a Proposed Sphere of Influence Plan Amendment May Have Profound Environmental and Planning Implications and Is Subject to CEQA.**

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it does not provide any textual or other analysis of the reasons for drawing the boundary line in the proposed location across the middle of the Project site nor any analysis of the potential environmental impacts that may result from drawing the sphere of influence plan boundaries in that location.



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Under the Cortese-Knox-Hertzberg Local Reorganization Act of 2000 (the "Act"), LAFCo decisions approving proposed sphere of influence plans for particular areas can have profound influence on the way the affected areas are likely to develop. Under section 56076 of the Act, a sphere of influence plan constitutes the LAFCo's "plan for the *probable physical boundaries and service area* of a local agency." Section 56375.5 requires that every LAFCo decision relating to changes of organization, including proposed annexations by cities, "shall be consistent with the spheres of influence" of the pertinent local agencies.

In determining the appropriate sphere of influence plan for a given area, the LAFCo must follow policies that are designed to "promote the logical and orderly development within the sphere." (Section 56425(a).) Recognizing the key importance of the sphere of influence plan,<sup>2</sup> the Act dictates that, before the LAFCo approves or amends any such plan, it must make specific factual determinations regarding the following:

- (1) The *present and planned land uses* in the area, including agricultural and open-space lands.
- (2) The *present and probable need for public facilities and services* in the area.
- (3) The *present capacity of public facilities and adequacy of public services* that the agency provides or is authorized to provide.
- (4) To the extent they are relevant, *the existence of any social or economic communities of interest* in the area.

(Section 56425(e).)

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<sup>2</sup> As one example of the sphere of influence plan's practical importance, if an area is to be placed within a city's sphere of influence, the affected city and county representatives must meet to reach agreement on how, prior to actual annexation by the city, the county will make its future land use decisions (e.g., zoning and other development standards) in that portion of the unincorporated area in a manner that "reflects the concerns of the affected city" and that "promotes logical and orderly development within the sphere." (Section 56425(b).) Once that agreement is approved by the LAFCo, the city and county must adopt it, and, thereafter, "any development approved by the county within the sphere shall be consistent with" the agreement. (Section 56425(c).) If no such agreement is reached, the LAFCo must implement its own planning policies regarding the sphere. (Section 56425(d).)

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Furthermore, when the LAFCo initially prepares, and then later updates, its sphere of influence plan for an area, it must conduct a "service review of the municipal services" being provided within the county, particularly within the affected area, with respect to the following:

- (1) Infrastructure needs and deficiencies.
- (2) Growth and population projections for the affected area.
- (3) Financing constraints and opportunities.
- (4) Cost avoidance opportunities.
- (5) Opportunities for rate restructuring.
- (6) Opportunities for shared facilities.
- (7) Government structure options.
- (8) Evaluation of management efficiencies.
- (9) Local accountability and governance.

(Section 56430(a).) This service review must be completed before the LAFCo acts upon a city's sphere of influence amendment application. (Section 56430(c).)

Because these sphere of influence amendment issues have important environmental and planning implications, the Act expressly provides that, whenever a city requests that the pertinent sphere of influence plan be amended, *the LAFCo cannot consider the request without "first complying with [CEQA]."* (Section 56428(b).)

In *City of Livermore v. LAFCo of Alameda County* (1986) 184 Cal.App.3d 531, a LAFCo's sphere of influence guidelines had provided generally that existing and future urban development belongs in cities, making it difficult for special districts to extend their service areas to proposed urban development in the unincorporated areas. A private developer proposed an urban development project, "Las Positas," in the unincorporated area near Livermore's boundaries. As here, Livermore sought to extend its sphere of influence boundaries into the proposed Las Positas development area, but in that case the LAFCo rejected its application. The LAFCo then modified the former sphere of influence guidelines by deleting the former urbanization-in-cities policy, thereby facilitating future development of Las Positas within the unincorporated area.

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The Court ruled that a full EIR was required before the LAFCo could properly amend its sphere of influence plan as proposed. The Court explained the importance of CEQA compliance in connection with LAFCo sphere of influence decisions:

*The sphere of influence guidelines influence LAFCo decisions about development plans and future growth of cities and service areas. The guidelines play a part in determining whether growth will occur in unincorporated areas and whether agricultural land will be preserved or developed. They may change the focus of urban development by promoting county plans over city plans. These potential effects will certainly impact the environment. It is true that the precise effects are difficult to assess at this stage, but it is because impact is so easily foreseen that the revisions just be considered a project under CEQA.*

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As to the argument that the revisions are not a tangible physical activity, CEQA and its guidelines focus on the ultimate impact of a project, not on whether the project is tangible or intangible. The CEQA [guidelines] already include actions that are not physical activities.... Just as the amendment of a general plan will influence the future growth and development of cities, so too will the sphere of influence guideline revision have such an effect.... The "act or decision" we review here is not the decision that the project may or may not have a significant environmental impact, but the decision that it can or cannot be fairly argued that the project may have a significant environmental impact....<sup>3</sup>

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<sup>3</sup> In *Muzzy Ranch Co. v. Solano County Airport Land Use Commission* (2005) 125 Cal.App.4th 810, 826-830, the Court of Appeal recently reiterated that CEQA requires EIRs be prepared early in the decision-making process – in that case, at the point in time when an airport land use plan was adopted by an Airport Land Use Commission ("ALUC"). There, the ALUC had adopted its plan that would preclude jurisdictions surrounding an airport from approving residential development in a large area that would potentially be exposed to high noise levels from aircraft using the airport. In ruling that the ALUC's decision was subject to CEQA, the appellate court explained that the approved plan had the potential to displace housing development outside the affected area, a potential that was not so "speculative or remote" that it could not be considered a "reasonably foreseeable" consequence of the ALUC's new plan. The ALUC's plan was "a necessary step in the chain of events" that "set in motion a process and can be expected to carry some authority." The Court found the *Livermore* decision about sphere of influence plans to be directly on point, because the sphere of influence guidelines "play a part in determining" where growth will occur, even though the precise effects might be difficult to assess. The critical factor

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Precisely these important CEQA considerations led Judge Janavs to rule in the earlier Superior Court proceedings regarding the Las Lomas Project area that Santa Clarita must prepare a full EIR before it can undertake further discretionary actions to obtain jurisdiction and control over the subject area.

**II. Without Adequate Evaluation Under CEQA of How Redrawing the Sphere of Influence Plan Boundaries Could Potentially Impact the Environment Generally and the Las Lomas Project In Particular, Los Angeles' Proposed Sphere of Influence Plan Amendment Is Premature.**

Since 2002, Las Lomas has been cooperating with Los Angeles to prepare a draft EIR in support of the required discretionary actions by Los Angeles and the LAFCo to bring about the Las Lomas Project. Las Lomas has expended almost \$1.5 million in fees to the environmental consultants who are assisting in preparing the draft EIR, and has paid more than \$25,000 in processing fees directly to Los Angeles. Today, Las Lomas still fully intends to develop the Las Lomas Project or whatever lesser development entitlements may finally be granted to it by whichever governmental authority is ultimately awarded long-term jurisdiction and control over the Las Lomas Project area.

This full EIR should gather all relevant data and information, and should evaluate, among other matters, the ways that the government control over the Las Lomas Project area, including where the sphere of influence boundary lines should be drawn, may influence the nature and intensity of development, as well as the ability of the developer and the governing city to deliver urban services and to formulate and implement mitigation measures in connection with that development.

Los Angeles' present ND regarding the proposed Sphere of Influence Application provides essentially no information and analysis regarding how the sphere of influence plan should deal with the Las Lomas Project area. More study is needed on a host of environmental issues. A few examples suffice.

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must be to avoid a "piecemeal environmental review" by which initial decisions about an overall project are approved early without adequate environmental review.

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- Los Angeles'ND and the accompanying staff report focus almost exclusively on stating a few obvious platitudes about the watershed implications of generally drawing the sphere of influence plan boundary at the ridgeline across the Las Lomas Project parcel and elsewhere.
- Watershed may be a factor, but certainly not the only factor, in drawing a sphere of influence boundary line. Traffic, for example, clearly must be considered. Absent comprehensive traffic mitigation measures, the traffic that the Las Lomas Project will potentially generate on the 70 to 75 percent of the land that is north of the watershed line will primarily flow south into Los Angeles. Los Angeles' Department of Transportation has informed Las Lomas that the great majority of the traffic expected to be generated by Las Lomas will be southbound, requiring extensive mitigation within Los Angeles. Certainly, Los Angeles will have greater impacts from any unmitigated traffic generated by the Las Lomas Project, and Los Angeles should seek direct authority and control over the boundaries of the Project area, so that it can more directly monitor and implement traffic mitigation measures that will address project-related traffic.
- The proposed Las Lomas elementary school and one of the two proposed high school academies are on the north side of the watershed line, while the other proposed high school academy is on the south side of the watershed line. Dividing these schools into separate jurisdictions would undercut the schools' ability to plan coherently for new facilities and their construction and operations.
- The Las Lomas industrial center and hotel are proposed to be located in the northern portion of the project area. If Los Angeles pursues control over only the southern portion of the parcel, a potential jobs/housing imbalance will potentially be created – with Santa Clarita getting the thousands of jobs and millions of dollars in taxes annually that would be generated by these important project components, and Los Angeles getting the residents and the need to provide public services and facilities for them. If Santa Clarita then obtains control over the northern portion and pursues its long-standing plans to approve only ultra-low density single-family residential land uses, these jobs and taxes could disappear entirely without any meaningful public discussion in Los Angeles.
- Several existing and proposed major public infrastructure systems presently straddle the watershed line, including: the existing MTA commuter line tunnel and the proposed MTA station; the existing high pressure gas lines; the existing

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California aqueduct; the existing Sunshine Canyon landfill; the proposed wildlife corridors that Las Lomas is presently designing with the assistance of the Santa Monica Mountains Conservancy; the existing high tension power lines and the proposed realignment; the existing and proposed internal access roads; the proposed freeway improvements providing access both to the proposed park and ride multi-modal transit station and to the project site; the existing and proposed hiking and equestrian trails meander across the watershed line several times.

- The question of where the water supply will come from to serve the Project area presents special problems. Los Angeles' Department of Water and Power has adequate water supply to serve the entire proposed Project development. Santa Clarita and/or Los Angeles County would rely on special districts to secure and provide water. The availability of sufficient water to serve sizable development through these special districts is highly questionable.
- LAFCo, Santa Clarita and Los Angeles each have long-standing traditions of respecting landowner requests not to be split into multiple jurisdictions, while also attempting to honor landowner preferences as to which jurisdiction would best serve their public services and facilities needs. The underlying landowners of the Las Lomas Project area unanimously desire annexation to Los Angeles, not to Santa Clarita, either in whole or in part.
- For these reasons, existing jurisdictional boundaries in the vicinity do not follow the precise watershed line, but rather weave around these major infrastructure systems and other features, generally avoiding dividing any single land ownership into multiple jurisdictions.

In summary, the watershed line is but one among numerous significant considerations in formulating a sphere of influence plan boundary: wildlife and other environmental issues, regional infrastructure issues, demographic issues, economic development issues, ownership patterns that do not mirror the natural features, and fiscal issues, just to name a few, are highly important. The purpose of a sphere of influence plan is to integrate environmental and planning information on all such major issues, before making the decision on how these governmental jurisdictions and service areas should be shaped. The factors discussed above would appropriately lead to the conclusion that Los Angeles should be the local agency with permitting authority over the entirety of the Project area.

For reasons that appear to be explained largely by a desire to implement the reported "backroom deal," Los Angeles now proposes to amend its sphere of influence plan to encompass

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only about 25 to 30 percent of the Las Lomas Project area within its boundary, leaving the remainder within the unincorporated area and available to Santa Clarita. Whatever the precise figure, Los Angeles' proposed action is clearly premature, coming before the necessary EIR data gathering and analysis about the Las Lomas Project area are completed. Keeping in mind that the "fair argument" test applies to the question of whether a full EIR must be prepared, there seems little doubt that an EIR is needed here before Los Angeles takes a critical first discretionary action to initiate its control over only a portion of the Las Lomas Project area, while excluding the majority of that area from the presently proposed sphere of influence boundary line.

**III. Los Angeles' Proposal to Draw the Sphere of Influence Plan Boundary Through the Middle of the Las Lomas Project Area Is Highly Prejudicial to Las Lomas.**

The Draft EIR currently being prepared for the Las Lomas Project will detail the challenging and complex issues that must be confronted in mitigating the Project's potentially significant environmental impacts. For example, the potential traffic impacts generated by 5,800 dwelling units and 2.3 million square feet of office/research and development are of special concern to both Las Lomas and the citizens of Los Angeles. In order to successfully address and mitigate these impacts, Las Lomas must formulate and implement creative programs that will encourage people who work at Las Lomas to live in Las Lomas, and that will solve transportation/commuting problems where the work/live formula does not apply. Las Lomas is already working with regional transportation agencies and other interested parties to develop new innovative programs that can address these issues. New Caltrans-constructed freeway intersections, new MTA commuter terminal facilities for the Metro-rail transit lines, new internal jitney systems, new "fair share" surface street intersection improvements and/or linkage improvements are just a few of the mitigation measures being considered in connection with mitigating Project impacts. These mitigation measures are heavily dependent upon the cooperation and coordination of regional and local agencies working together to formulate and implement successful programs. If Los Angeles were to prematurely signal that its jurisdictional interest in the Las Lomas Project were limited to only the southerly 25 to 30 percent of the Project area, that would severely compromise Las Lomas' ability to work with these transportation-serving agencies to formulate these mitigation plans.

Beyond this very real and practical prejudice to Las Lomas, a Los Angeles action to encompass only 25 to 30 percent of the Las Lomas Project area within its sphere of influence would invite Santa Clarita to bring the remainder of the Las Lomas Project area within its jurisdictional control. Of course, that is precisely what is already happening now – with Santa Clarita now concurrently proceeding to include the remaining 70 to 75 percent of the Project area

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within its sphere of influence plan. Water districts, school districts and other public agencies may soon seek to include that remaining Project area within their service provider plans.

The prejudice to Las Lomas becomes all the more concerning in light of the fact that, at the present time, there is no apparent necessity for Los Angeles to pursue any sphere of influence plan boundary adjustment for the Project area. Los Angeles may have concerns and desires regarding its future control over the remainder of the San Fernando Valley generally. But there is no apparent or discernable interest served on the part of Los Angeles that is addressed by proceeding at this time to place a portion of the Las Lomas Project area into the Los Angeles sphere of influence. The Los Angeles ND and staff report do not indicate any particular intergovernmental decision or any potential environmental or other impact relating to the Project area that compels an immediate or near-term sphere of influence plan boundary adjustment at that location.

Consequently, it would be an easy matter for Los Angeles to carve out the Las Lomas Project area from the current proposed sphere of influence plan boundary adjustment. By excluding the Project area from the current sphere of influence proposal, Los Angeles would gain the benefit of having the appropriate CEQA analysis regarding that area before it considers splitting that area into different jurisdictional parts. But the proposed inclusion of only approximately 25 to 30 percent of the Project area into the Los Angeles sphere of influence plan appears designed merely to accomplish the Daily News-reported "backroom deal".

## CONCLUSION

Los Angeles cannot act on the proposed Sphere of Influence Application based on the current ND. In order to avoid litigation and comply with CEQA, Los Angeles could exclude the entirety of the Project area from the proposed new boundaries. This would avoid a premature, piecemealed decision on the first of the discretionary actions in the pending Las Lomas Project entitlement request. When the Project EIR is completed, Los Angeles will have the necessary environmental data and analysis upon which it can make appropriate decisions regarding the proposed Project's jurisdictional boundaries, its intensity of use, and its infrastructure requirements and mitigation measures. Alternatively, Los Angeles could include the entirety of the Las Lomas Project area within the proposed sphere of influence plan boundaries, thereby allowing Las Lomas to complete its EIR without prejudice to its ability to develop mitigation



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measures for the entirety of the proposed Project. Because this alternative approach is consistent with its pending Project entitlements application, Las Lomas would not object to this latter approach.

Very truly yours,



Carlyle W. Hall, Jr.

Enclosures

cc: Ed P. Reyes, Chair  
Planning & Land Use Management Committee

Gerri Burge, Esq.  
Office of the Los Angeles City Attorney

CITY OF LOS ANGELES  
OFFICE OF THE CITY CLERK  
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CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF PREPARATION

(Article VI, Section 2 - City CEQA Guidelines)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                       |                               |                                                                                        |
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| TO:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | RESPONSIBLE OR TRUSTEE AGENCY<br>State Clearinghouse                                                                                  | FROM:                         | LEAD CITY AGENCY Los Angeles Department of City Planning                               |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | ADDRESS (Street, City, Zip)<br>Office of Planning & Research<br>Attn: Glen Stober<br>1400 Tenth St., Room 121<br>Sacramento, CA 95814 |                               | ADDRESS (Street, City, Zip)<br>200 N. Spring Street, Room 763<br>Los Angeles, CA 90012 |
| SUBJECT: Notice Of Preparation of a Draft Environmental Impact Report                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                       |                               |                                                                                        |
| PROJECT TITLE<br>Las Lomas Annexation Project                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                       | CASE NO.<br>ENV-2002-3013-EIR |                                                                                        |
| PROJECT APPLICANT, IF ANY<br>Las Lomas Land Company, LLC                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                       |                               |                                                                                        |
| <p>The City of Los Angeles will be the Lead Agency and will prepare an environmental impact report for the project identified above. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by this City when considering your permit or other approval for the project.</p> <p>The project description, location and the probable environmental effects are contained in the attached materials.</p> <p>[ ] A copy of the Initial Study is attached.</p> <p>[✓] A copy of the Initial Study is not attached.</p> <p>Due to the time limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.</p> <p>Please send your response to <u>Maya Zaitzevsky</u> at the address of the Lead City Agency as shown above. We will need the name of a contact person in your agency.</p> <p>Note: If the Responsible or trustee agency is a state agency, a copy of this form must be sent to the State Clearinghouse in the Office of Planning and Research, 1400 Tenth Street, Sacramento, California 95814. A state identification number will be issued by the Clearinghouse and should be thereafter referenced on all correspondences regarding the project, specifically on the title page of the draft and final EIR and on the Notice of Determination.</p> |                                                                                                                                       |                               |                                                                                        |
| SIGNATURE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | TITLE                                                                                                                                 | TELEPHONE NUMBER              | DATE                                                                                   |
| Maya E. Zaitzevsky                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | City Planning Associate                                                                                                               | (213) 978-1355                | 6/27/02                                                                                |

DEPARTMENT OF  
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**PRE-DRAFT ENVIRONMENTAL IMPACT REPORT REQUEST FOR COMMENTS AND  
NOTICE OF PUBLIC SCOPING MEETING**

**EIR NO.:** ENV-2002-3013-EIR

**PROJECT NAME:** Las Lomas Annexation Project

**PROJECT DESCRIPTION:** A proposed annexation of an approximately 555 acre portion of Los Angeles County to the City of Los Angeles in conjunction with the development of a mixed-use community with approximately 5,800 dwelling units of low to very high density, 2,300,000 sf of Office/Research & Development, 250,000 sf of Community Facilities (including a K-8 school), 225,000 sf of Neighborhood Retail, a 300-room hotel, and 285 acres of open space. Proposed recreational amenities include pedestrian and bike trails, parks, a library, theaters, and a museum. The applicant also proposes to connect to the MetroLink commuter rail, and construct a trolley to serve the community. Five single-family dwellings would be demolished, and the existing transmission lines and cellular tower located on the southern portion of the project would be relocated to other portions of the site. The project would include its own wastewater treatment facility, alternative energy generation facilities water tank, and a series of pump stations. The following discretionary actions are being requested: Sphere of Influence, General Plan/Community Plan Amendment, Zone Change, Specific Plan, Vesting Tentative Tract Map, Development Agreement, US Army Corps of Engineers Section 404 permit, US Fish and Wildlife Service Permit, California Department of Fish and Game Permit, Oak Tree Permit, and CA Regional Water Quality Control Board NPDES Permit.

**PROJECT LOCATION/ADDRESS:** 23110 and 23500 The Old Road, County of Los Angeles between Interstate 5 and Highway 14 Exit and Calgrove Boulevard Exit.

**PLANNING AREA:** N/A

**COUNCIL DISTRICT:** N/A



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ity of  
Santa Clarita

August 9, 2002

Maya Zaitzevsky, Project Coordinator  
City of Los Angeles  
200 North Spring Street, Room 763  
Los Angeles, CA 90012

Subject: City of Santa Clarita Comments on the Las Lomas Notice of Preparation (NOP)

Dear Ms. Zaitzevsky:

The City of Santa Clarita appreciates the opportunity to comment on the Las Lomas Notice of Preparation. This proposal is adjacent to the City of Santa Clarita's southern border.

**Project Description**

According to the project description supplied by the City of Los Angeles as part of the Scoping Meeting notice and Notice of Preparation, the proposed project has the following characteristics:

The project requires the annexation of the 555-acre parcel currently located in the unincorporated portion of the County of Los Angeles to the City of Los Angeles.

The project requires the following discretionary approvals:

- Sphere of Influence
- General Plan/Community Plan Amendment
- Zone Change
- Specific Plan
- Vesting Tentative Tract Map
- Development Agreement
- US Army Corps of Engineers Section 404 Permit
- US Fish and Wildlife Service Permit
- California Department of Fish and Game Permit
- Oak Tree Permit
- California Regional Water Quality Control Board NPDES Permit

Includes 20,000,000 cubic yard of grading with no import or export of soil.

The narrative states the "proposed development would consists of 147 acres of residential uses, 30 acres of commercial uses (including 33 acres of joint uses), and 285 acres of open space uses." Based on the land use table supplied as part of the Environmental Assessment Form, the 33 acres of mixed use are clearly separate. In addition, the information provided to date includes inadequate information about proposed public services and utilities.



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- The EIR needs to include a clear and internally consistent summary of the land uses included as part of the project, their respective acreages, anticipated square footages, and densities (in units per acre, square footage per acre, and floor area ratio).
- The concept plan provided to date does not show the location of the various land uses. The project description needs to show the specific location of the various uses on the site, including the location of utility and public services such as the wastewater treatment facility, alternative energy generation facilities, water tank and pump stations, trolley line, Metrolink connection, stormwater facilities, transit facility, pedestrian and bike trails, parks, library, theaters, and museum.
- The EIR needs to provide clear information about the proposed capacities of all public services and utilities to be provided on site.
- In order to provide the public, adjacent jurisdictions and responsible agencies with sufficient information to enable informed comment on the Draft EIR and the project, the following information needs to be circulated as part of the Draft EIR by including it in the appendices to the EIR:
  - General Plan/Community Plan Amendment text;
  - Zoning Request;
  - The Specific Plan; and,
  - Vesting Tentative Tract Map
  - Existing and proposed topographic maps
  - A project grading plan demonstrating no import or export of soils
  - Annexation application
  - MTA feasibility study (Including cost and lost time for additional stop)

### Aesthetics

Prior to presenting any conceptual drawing for the project, the floor area ratios and densities of each use area or site subareas should be described. Based on a preliminary calculation of densities, from the very limited information contained in the project description, it would appear that the project views presented by the applicant at the scoping meeting and in the applicant's project brochure are highly unrealistic. The project is not adequately reflective of the impacts to the sites topography, proposed land use and density, oak trees and degradation of ridgelines. Only views consistent with likely densities should be presented in the EIR.

Although the project is not in the City, the project, as proposed, will have significant visual impacts resulting from the proposed grading. According to the project application, 60% of the project site contains slopes greater than 50%, 27%

of the site is covered with slopes of 25-50%, and 7% of the site is covered with slopes of 10-25%. The project includes 20,000,000 cubic yards of grading. The EIR must analyze the impact of the project's extensive grading on the aesthetics of the area.

### Agricultural Resources

According to the project description included as part of the Notice of Preparation, the project site is currently zoned A-2-1 Heavy Agricultural in the County of Los Angeles Development Code. The EIR should therefore include a detailed analysis of the project's impact and the impact of cumulative development on agricultural land.

### Air Quality

The EIR must provide a full air quality analysis including:

- Analysis of whether project emissions would exceed SCAQMD Thresholds of Significance during project construction or operation (mobile and stationary sources). The analysis must include consideration of all emissions associated with public services and utility improvements, as well as project land uses and traffic.
- Analysis of whether project construction and operational emissions would result in either: (a) an exceedance or (b) a worsening of an existing exceedance of State and Federal Ambient Air Quality Standards.
- An analysis of whether the project, in combination with other cumulative development in the area, would result in either: (a) an exceedance or (b) a worsening of an existing exceedance of State and Federal Ambient Air Quality Standards.
- An analysis of the project's consistency with the AQMD (Will the project (1) increase the frequency or severity of violations or (2) exceed assumptions in the AQMD).
- An analysis of the project's conformance with the State Implementation Plan (SIP).
- An analysis of the project's conformance with Caltrans Congestion Management Plan

Given the size of the project, the significant increase in density requested and the changes in planned land uses, it is likely that the project will be inconsistent with the AQMP and will be in nonconformance with the SIP.

The project site is located along the I-5 corridor in the vicinity of the interchange of the I-5 with the SR-14. Air quality monitoring on the project site should be conducted to enable an adjustment of ambient air quality data to more closely approximate site conditions. Otherwise, it is likely that air quality data from the local monitoring station will understate the degraded air quality along the I-5 corridor.

## **Hazards and Hazardous Materials**

### **Public Health**

The project site is located along the I-5 corridor in the vicinity of the interchange of I-5 with SR-14. The EIR should analyze the impact of the project's location on:

- o Public health – The public health impacts of project air quality emissions need to be addressed if the project: (1) results in the introduction of additional population in an area where ambient air quality levels exceed state standards; (2) would result in a violation of a state ambient air quality standard; or (3) would lead to a worsening of an existing state air quality standard violation or contribute to a cumulative worsening of a state air quality standard violation.

The EIR should evaluate all easements and hazards associated with them on-site. The project site contains a number of easements for high tension electrical lines, gas lines and possibly oil lines. All easements should be labeled on a map.

### **Hazardous Materials Exposure**

The project site is currently zoned A-2-1 Heavy Agricultural. As part of the EIR, at a minimum a Phase 1 Hazardous Materials Site Assessment should be conducted. The EIR should include a detailed description of past uses of the site, and the potential for soil contamination associated with historic uses and observed site conditions. If the Phase 1 Assessment indicates the potential for contamination, site testing and preparation of a Phase 2 should be conducted prior to release of the Draft EIR.

### **Fire**

The proposed project is located within a Potential Wildfire and Fire Hazard Area. The EIR should evaluate the potential impacts of the project risk exposure and emergency response.

### **Emergency Response and Evacuation**

The EIR should evaluate the potential impact of the project on emergency response and evacuation plans for the area. The project will add a significant amount of traffic to I-5, the main connector route between the Santa Clarita and San Fernando Valleys. The impact of this additional traffic in the event of a seismic event should be evaluated.

### **Biological Resources**

As part of the preparation of the EIR, a detailed biological resources assessment of the project site should be conducted. The assessment and the EIR should address the potential of the project, and the project in combination with

cumulative development to adversely affect sensitive species or habitats, sensitive natural communities, rare or endangered plants and animals, wildlife movement corridors, oak trees and other plants or animals protected by the City of Santa Clarita, City of Los Angeles or the County of Los Angeles ordinances, provisions of any adopted Habitat Conservation Plan, and Significant Ecological Area review requirements.

The EIR should specifically address the impact of the project on the wildlife corridor that currently exists between Whitney Canyon and Towsley Canyon.

The EIR should clearly describe any differences in the review or mitigation requirements of the three jurisdictions regarding biological resources, including Los Angeles County Significant Ecological Area review requirements.

### **Cultural Resources**

The EIR should include a cultural resource assessment that identifies any paleontological, architectural or historic resources on the site and the projects potential impacts to such resources.

The San Fernando Tunnel (circa 1876) runs along the edge of the project site. The tunnel was constructed utilizing the labor of Chinese workers. The workers suffered numerous fatalities as a result of gas explosions, untimely shots and other hazards. Some of bodies were returned to China however some are believed still buried near the tunnel portals. The possibility of Chinese worker burial sites must be addressed.

This tunnel has been deemed eligible for listing on the National Register of Historic Places. The tunnel is currently being used by MetroLink. The tunnel design limits the types of MetroLink vehicles that can be used on this leg of the MetroLink system. The EIR must clearly identify how the project applicant proposes to "connect to the MetroLink commuter rail." Any physical alteration of the historic tunnel must be described and analyzed by a historic preservation architect who meets the Secretary of the Interior's Standards. The analysis should also address whether project induced changes in demand and project plus cumulative demand will result in pressure to alter the tunnel structure in a manner that could impact this historic resource. In addition, any changes in drainage and runoff must be analyzed to determine if they will further exacerbate existing water problems within the tunnel.



### Geology and Soils

As part of the preparation of the EIR and the development of the specific plan, a geotechnical study should be prepared for the project. The study should describe existing soil and geological hazards conditions and evaluate the feasibility of the project's grading plan.

Based on the City of Santa Clarita's General Plan, it would appear the project site is in close proximity to the San Gabriel Fault, the Placerita Fault, Beacon Fault and particularly the Whitney Fault. As part of the geotechnical analysis of the project, a registered geologist should determine whether trenching should be conducted on the project site in order to determine if active fault traces are present.

The geotechnical evaluation of the project site should identify any areas with past landslides and where future landslide areas exist. Liquifaction potential should also be assessed. The EIR should identify mitigations to address potential landslide issues, including redesign for avoidance.

The terrain of the proposed project is not conducive to grading. An extensive geology and geotechnical study should be prepared and approved as part of the environmental document.

### Hydrology and Water Quality

The EIR should include a detailed analysis of existing drainage patterns, changes in runoff and drainage associated with the project, and whether the project and the project and cumulative development will result in flooding or other hazards or impacts to the stormwater system.

The EIR should evaluate the application of all facets of the National Pollutants Discharge Elimination System (NPDES) permit pertaining to discharge, runoff and illicit connections from residential and industrial/commercial uses.

The EIR should include a flood hazards analysis.

The Stormwater Pollution Prevention Plan for the project should be included as an appendix to the EIR. The EIR should describe the proposed stormwater system for the project, and an evaluation of whether downstream improvements would be required based on the additional flows created by the project and the project and cumulative development.

The EIR should evaluate the project's impacts to the natural watershed in terms of the quality, flow rate and volume of surface water runoff and impacts to beneficial uses and protected animal and plant species.

The EIR should include an analysis of the project's compliance with and ability to comply with current NPDES requirements during both construction and operation of the project.

The EIR should evaluate the project's impact to the Total Maximum Daily Load (TMDL) regulations being established by the Regional Water Quality Control Board specific to, but not limited to, chloride, nutrient, bacteria and trash.

The EIR should evaluate the need for a waste water treatment facility for the project.

The EIR should evaluate the project's ability to use reclaimed water.

A sewer area study should be prepared and approved as part of the EIR.

The EIR should evaluate the project's ability to maintain floodplains.

The EIR should evaluate the project's impact on hydrology and hydraulics on the existing storm drain system in the Santa Clarita Valley. A drainage concept study should be prepared and approved as part of the environmental document.

#### **Land Use and Planning**

Since the proposed project site is currently located in an area which is under the jurisdiction of the County of Los Angeles, the land use and planning section of the EIR should include an analysis of the project's consistency with current County land use and zoning designations for the site, as well as an analysis for the project's consistency with current County development standards for the use types proposed.

Since the proposed project site is currently located within the City of Santa Clarita's Planning Area and abuts the City, the land use and planning section of the EIR should include an analysis of the project's consistency with the current land use and zoning designations for the site envisioned by the City in its General Plan (i.e. Residential Estate 0-0.5 dwelling units per acres) as well as current City development standards for the use types proposed.

#### **Annexation**

Since the project includes a request for annexation to the City of Los Angeles, the land use and planning section of the EIR should include an analysis of the project's consistency with any current City of Los Angeles land use and zoning designations for the site envisioned in the City's General Plan, as well as an analysis for the project's consistency with current City development standards for the use types proposed.

The project includes annexation of the project site to the City of Los Angeles, when the project site abuts the City of Santa Clarita and does not abut the City of Los Angeles. The EIR should provide an analysis of the factors that the LAFCO must

consider in reviewing annexation proposals including, but not limited to, the following (Section 56841):

- a. Population, population density, land area and use, per capita assessed valuation, topography, natural boundaries, drainage basins, proximity to populated areas, and the likelihood of significant growth during the next ten years.
- b. Need for organized community services, present cost and adequacy of government services and controls, probable future needs, probable effect of the annexation and of alternative courses of action on the cost and adequacy of services and controls in the area and vicinity.
- c. The effect of the proposed annexation and of alternative actions on adjacent areas, on mutual social and economic interests and on the local government structure of the county.
- d. Conformity of the proposal and its effects with LAFCO policies on providing planned, orderly, efficient patterns of urban development and with state policies and priorities in conversion of open-space lands to other uses.
- e. Effect of the proposal on maintaining the physical and economic integrity of lands in an agricultural preserve in open-space use.
- f. Clarity of the boundaries of the territory, the nonconformance of proposed boundaries with lines of assessment or ownership, the creation of islands or corridors of unincorporated territory and other similar matters affecting the proposed boundaries.
- g. Consistency with appropriate city or county general and specific plans.
- h. The sphere of influence of any agency which may be applicable to the proposal being reviewed.

This section of the EIR should include a summary of the findings of the more detailed issue area specific analysis of the project consistency with applicable regional resource plans, including: South Coast Air Quality Management Plan, the Regional Transportation Plan, the Regional Transportation Improvement Program, the Congestion Management Plan, the Regional Housing Needs Assessment, the Southern California Hazardous Management Plan, applicable biological resource preservation plans, etc.

The project applicant at the scoping meeting and the applicant's project literature states that the project is consistent with smart-growth principles. The EIR should therefore include an analysis of the project's consistency with both the Southern California Association of Governments Livable Communities principles and the County of Los Angeles' Guidelines for Development of Livable Places.

### Noise

The EIR should evaluate the noise impact of project construction and operation on adjacent uses. This should include an evaluation of whether project traffic either alone or in combination with cumulative development will result in the need for additional sound barriers along freeway corridors.

The EIR should evaluate the potential noise impact of placing a large concentration of homes and businesses in proximity to the I-5 and SR-14 freeways. The 70 and 65 dBA noise contours associated with freeway traffic currently extends over a portion of the project site, and most of the project site is within a 60 dBA noise contour. The EIR should assess the ability of the project to comply with interior and exterior residential noise standards.

### Population and Housing

The EIR should include an evaluation of the project's population and housing impacts. Consistency of the project and the project and cumulative development with SCAG's population, employment and housing forecasts for the area should be assessed.

The EIR should evaluate the impact of the project, and the project and cumulative development on the area's jobs/housing balance.

### Public Services

#### **Fire Protection**

The EIR should clearly explain how and by which jurisdictions facilities services will be provided to the project.

The County of Los Angeles, the City of Los Angeles and Santa Clarita service providers should be contacted for their estimates of the impact of the project, and cumulative development, on the cost and availability of fire protection and emergency services.

The EIR should clearly identify whether the project will result in the need for additional facilities or equipment, where such facilities will be located and how they will be funded, and how such equipment will be provided and funded. Any impacts to service provision and facilities and equipment needs should be clearly identified in the EIR.

If the project includes the construction of new facilities, the EIR should analyze whether site size, configuration and building square footage and design complies with applicable facility design standards.

### **Police Protection**

The EIR should clearly explain how and by which jurisdictions and facilities, services will be provided to the project.

The County of Los Angeles, City of Los Angeles and Santa Clarita service providers should be contacted for their estimates of the impact of the project and cumulative development on the cost and availability of police protection in their area.

The EIR should clearly identify whether the project will result in the need for additional facilities or equipment, where such facilities will be located and how they will be funded, and how such equipment will be provided and funded. Any impacts to service provision and facilities and equipment needs should be clearly identified in the EIR.

If the project includes the construction of new facilities, the EIR should analyze whether site size, configuration and building square footage and design complies with applicable facility design standards.

### **Schools**

At the scoping meeting for the project, the Superintendent of the Newhall School District indicated that his District was not consulted regarding likely school construction needs resulting from the project, and that the number of schools required to serve project school demand would be well in excess of the one school included in the project description. During the preparation of the EIR, and more importantly, during the preparation of the Specific Plan which should occur prior to preparation of the EIR, the school districts in the area should be consulted as to the number of schools required to serve the K-12 school demand generated by the project. If the project does not include provision of the schools needed to serve the project's demand, the project should be classified as having a significant unmitigated impact on school services.

The EIR should include a full analysis of project school demand generation, the number of schools required to serve projected demand, and whether the project as proposed can meet the school site requirements of the California Department of Education.

The project site is located along the I-5 corridor in the vicinity of the interchange of I-5 with SR-14. As part of either the school impact, air quality analysis, or the hazards analysis, the EIR should analyze the impact of the project's location on interior and exterior school air quality at proposed on-site school facilities.

### **Parks**

The EIR should include an analysis of the project's consistency with National Recreation and Parks Association (NRPA), City of Los Angeles, County of Los Angeles and City of Santa Clarita parks standards for the various categories of parks (neighborhood, community, regional, etc.), and for park facilities. For

example, the City of Santa Clarita distinguishes between community parks (should be 40 acres in size and located to serve a population of 20,000 within a two-mile radius) and neighborhood parks (should be 5-10 acres in size and located to serve a population of 5,000 within one-half mile radius). Both types of parks include improvements and facilities. The proposed project includes 5,805 proposed dwelling units. Given current persons per household rates in the City and the 10 acres of parks and landscape areas proposed as part of the project, it would appear the proposed project is significantly deficient in park services and facilities.

Provision of open space areas with substantial slopes is not a mitigation or replacement for active park services and facilities. Failure to provide adequate parks will result in additional demand for park and other recreational facilities in the City of Santa Clarita. The proposed project will also create demand for regional park facilities, Regional Parkland impact should also be analyzed.

#### **Other Public Facilities**

The EIR should include a similar service impact evaluation for library and other public services.

If the project will not fully mitigate its public service impacts through the direct provision of services, the EIR must evaluate the impact of the project on the service provision of adjacent jurisdictions.

#### **Trails**

The City of Santa Clarita is partnering with the Santa Monica Mountains Conservancy, the City of Thousand Oaks, Simi Valley and Ventura County to create a trail link from the Pacific Crest Trail just east of the City of Santa Clarita through the Santa Clarita Valley and connecting with the Rim of the Valley Trail. The EIR should address the connection from the City of Santa Clarita to the Santa Monica Mountains Conservancy Land west of Interstate 5.

As with all issue areas, the analysis of impacts to park services must address the impact of the project and the impact of the project in combination with cumulative development.

#### **Transportation and Traffic**

The project description must provide a clear and specific description of:

- Site access
- Internal circulation routes (paratransit and commuters including how it will connect to Santa Clarita Transit, LADOT, MTA, etc)
- Internal transit routes
- Freeway access
- Metrolink access and method of connection
- Bicycle paths
- Location of any transit stations or bike routes.

- A sufficiently detailed description of project land uses and square footages to allow calculation of project trip generation.

The traffic analysis for the project must address:

- Project and cumulative trip generation
- Mode split assumptions with a showing that such assumptions are feasible and realistic.
- Project and cumulative impacts to City of Santa Clarita roadways and intersections.
- Analysis utilizing the joint City of Santa Clarita/Los Angeles County traffic model.
- Project and cumulative impacts to area freeways, assessed using the current Caltrans Traffic Impact Analysis Guidelines. If freeway impacts are identified, or the project includes new freeway connections or ramp or other improvements, the EIR must demonstrate that mitigation is feasible and that a method for mitigation construction or implementation exists.
- Project and cumulative CMP impacts, including a CMP debit and credit calculation to determine the impact of the project on the City of Los Angeles' ability to meet its deficiency mitigation requirements.
- Project and cumulative impacts to local and regional public transit.
- Project and cumulative impacts to pedestrian, cyclist and vehicular safety.
- An analysis of the project's consistency with the Regional Transportation Plan, the Regional Transportation Improvement Program and any impacts of the project and the project in combination with cumulative development on achievement of Plan goals and compliance.
- Project transit connections to other public transportation systems.
- Project transit connections to other points of interest.
- Project connection to Metrolink commuter rail.

As part of the transportation analysis, the EIR should detail the specifics of the proposed Metrolink connection. Will this be a direct physical connection, with construction of an onsite station, or provision of shuttle service to existing stations? The EIR must demonstrate that Metrolink has been consulted and that any Metrolink components of the project are both feasible and acceptable to Metrolink, otherwise any trip distribution assumption and mode split will be subject to question.

Given the magnitude of the project and current Level of Service (LOS) on freeways in the project vicinity, it is likely the project will result in significant unmitigatable freeway and impacts. In addition, project site access does not appear adequate and direct project connectivity to the Metrolink would appear infeasible.

### **Utilities and Service Systems**

The EIR should clearly specify how project utility and service system needs will be met, the responsible agency/jurisdiction, and detail any services or facilities to be provided on-site.

The EIR should include a calculation of project electrical, natural gas, and water consumption and sewage and solid waste generation. Based on our preliminary calculation of likely project consumption and waste generation, the project will place substantial demands on utilities and service systems. As part of EIR preparation, service providers should be contacted, provided with a more detailed project description, and asked for an assessment of whether existing facilities are adequate to meet project needs, or whether the project will result in the need for additional facilities or service improvements.

### **Water**

Pursuant to recent state law, the water districts must be contacted and asked to provide an analysis of whether there is adequate water available to meet project water needs.

### **Landfill**

The EIR must include a detailed evaluation of whether there is sufficient landfill capacity to meet existing, project and project plus cumulative demand.

The EIR should evaluate the project's plan for solid waste disposal to ensure that all waste generated by the development is properly allocated to the City of Los Angeles and not the City of Santa Clarita or unincorporated Los Angeles County.

### **Mitigation Impacts**

As required under CEQA, the EIR must analyze the impacts of any mitigation measures specified to reduce or eliminate project impacts. Thus, should the project result in the need for on or off-site facilities or other physical improvements to meet project demand, the EIR must include an evaluation to the impacts of such improvements.

### **Growth Inducing Impacts**

With a project and rezoning request of this magnitude, particularly one that involves changes in jurisdictional boundaries, a detailed analysis of the growth inducing impacts of the project is important. Key to the analysis is whether the project will result in a land use future that is different than that assumed in key regional planning documents. If so, a detailed analysis of the impact of this difference in land use future must be performed.



### Cumulative Impacts

In preparing the cumulative project's list, each of the surrounding jurisdictions should be consulted and asked to provide a list of past, present or reasonably foreseeable projects that should be included in the analysis.

The proposed Soledad Canyon Sand and Gravel Mining Project should be included on the cumulative project's list even though that project was denied by the County. The project is currently in litigation with the applicant seeking to compel approval of the project. When analyzing traffic from this project, an appropriate PCE should be applied for truck traffic, as required by the Caltrans guidance for freeway impact analysis.

### Alternatives

The proposed project is located within the City of Santa Clarita's Planning Area and abuts the City of Santa Clarita. The EIR should include analysis of:

An alternative designed to be consistent with the City of Santa Clarita's applicable development standards for the types of uses proposed, including applicable hillside development standards, Oak tree preservation ordinance, land uses envisioned in the City's General Plan.

An alternative designed to be consistent with the County of Los Angeles' applicable development standards for the types of uses proposed, including applicable hillside development standards and consistent with the current land use and zoning for the site specified by the County of Los Angeles.

The EIR should include an impact reducing alternative which specifies the changes in the proposed project necessary to eliminate all significant unmitigatable impacts identified for the project.


Analysis of a No Project/No Change alternative.

### In Summary

Based on our preliminary review of the available project information, the project will result in a number of significant unmitigatable impacts. The project is clearly too large for the site, has not taken reasonable account of the site topography, and has not been planned in accordance with Smart Growth Principals. Therefore: the project does not appear to provide a properly balanced mix of housing, shops, work places, schools, parks and civic facilities, and is seriously deficient in its provision of schools; the plan provides for inadequate parks; and the plan does not respect the natural terrain and drainage.

Thank you for the opportunity to comment on the Los Lomas Notice of Preparation. We look forward to further participation in the process. If you have any questions or would like any additional information regarding the comments we have provided, please contact Kelvin Parker, Associate Planner, at (661) 255-4330.

Sincerely,



Vincent P. Bertoni, AICP  
Planning Manager

VPB:kp:ts

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cc: City of Santa Clarita City Council  
City of Santa Clarita Planning Commission  
City of Santa Clarita Parks and Recreation Commission  
Ken Pulskamp, Interim City Manager  
Jeffrey J. Lambert, AICP, Director of Planning and Building Services/  
Intergovernmental Relations Officer  
Conal McNamara, 5<sup>th</sup> District Planning Deputy for the County of Los Angeles  
Millie Jones, 5<sup>th</sup> District Field Deputy for the County of Los Angeles



RESOLUTION NO. 02-175

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF  
SANTA CLARITA, CALIFORNIA, STATING THE CITY OF SANTA CLARITA  
SHOULD BE THE LEAD AGENCY WITH APPROVAL AUTHORITY FOR ANY  
PROPOSED DEVELOPMENT SOUTH OF THE CITY OF SANTA CLARITA  
EAST OF INTERSTATE 5 AND WEST OF STATE ROUTE 14

WHEREAS, the Las Lomas Project proposes to annex an approximately 555-acre portion of unincorporated Los Angeles County to the City of Los Angeles in conjunction with the development of a mixed-use community with approximately 5,800 dwelling units of low to very high density. The project also includes 2,300,000 square feet of office/research and development, 250,000 square feet of community facilities (including a K-8 school), 225,000 square feet of neighborhood retail, a 300-room hotel, and 285 acres of open spaces; and

WHEREAS, the proposed project lies contiguous to the City of Santa Clarita's southern boundary east of Interstate 5 and west of State Route 14 and is within the geographic boundaries of the Santa Clarita Valley; and

WHEREAS, the applicant, Las Lomas Land Company, is requesting the following discretionary actions: Sphere of Influence; General Plan/Community Agreement; United States Army Corps of Engineers Section 404 Permit; United States Fish and Wildlife Service Permit; California Department of Fish and Game Permit; Oak Tree Permit; and California Regional Water Quality Control Board NPDES Permit; and

WHEREAS, the City of Los Angeles posted a Notice of Preparation (NOP) as the lead agency for the preparation of an environmental impact report on June 27, 2002; and

WHEREAS, the City of Santa Clarita, on August 9, 2002, submitted comments on the NOP addressing the following topic areas: project description; aesthetics; agricultural resources; air quality; hazards and hazardous materials; biological resources; cultural resources; geology and soils; hydrology and water quality; land use and planning; annexation; noise; population and housing; public services; trails; transportation and traffic; utilities and service systems; mitigation impacts; cumulative impacts; and alternatives; and


WHEREAS, any development in the Las Lomas project area will have a significant environmental impact upon the Santa Clarita Valley; and ✓

WHEREAS, the City of Santa Clarita is the closest municipality to the Las Lomas project site. The City of Los Angeles is not directly contiguous to the proposed project and currently does not have public facilities, services or a sphere of influence in the Santa Clarita Valley; and


WHEREAS, the City of Santa Clarita would be able to offer the most efficient provisions for municipal services, resulting in a mutual social and economic interest to the future residents of the project site.

NOW, THEREFORE, the City Council of the City of Santa Clarita does resolve the City of Santa Clarita should be the lead agency with approval authority for any proposed development south of the City of Santa Clarita, east of Interstate 5 and west of State Route 14 and this resolution shall be forwarded to the City of Los Angeles, the County of Los Angeles and the Local Agency Formation Commission (LAFCO).

PASSED, APPROVED AND ADOPTED this 10th day of December, 2002.

  
MAYOR

ATTEST:

  
CITY CLERK


STATE OF CALIFORNIA           )  
COUNTY OF LOS ANGELES    ) ss.  
CITY OF SANTA CLARITA

I, Sharon L. Dawson, CMC, City Clerk of the City of Santa Clarita, do hereby certify that the foregoing Resolution was duly adopted by the City Council of the City of Santa Clarita at a regular meeting thereof, held on the 10th day of December, 2002, by the following vote:

AYES:           COUNCILMEMBERS: Weste, Ferry, McLean, Kellar, Smyth

NOES:           COUNCILMEMBERS: None

ABSENT:        COUNCILMEMBERS: None

  
CITY CLERK

s:\pds\current\los angeles city project\council resolution of City Review of the Las Lomas Project Area



# CITY OF SANTA CLARITA NEGATIVE DECLARATION

☒ Proposed   ☐ Final

MASTER CASE NO:                      MC 02-474

PERMIT/PROJECT NAME:                      Prezone 02-004; Annexation 02-004

APPLICANT:                      City of Santa Clarita  
Department of Planning and Building Services  
23920 Valencia Blvd., Suite 300  
Santa Clarita, CA 91355  
Contact Person: Lisa Hardy, AICP, Senior Planner

LOCATION OF THE PROJECT:                      The project site is generally located east of Interstate 5 and west of State Route 14, adjacent to and outside the southern existing limits of the City of Santa Clarita in the unincorporated area of County of Los Angeles.

DESCRIPTION OF THE PROJECT:                      A proposal for a Prezone for a mostly undeveloped site known as the South Santa Clarita Annexation located in unincorporated Los Angeles County. The project site is currently designated RE (Residential Estate) and RM (Residential Moderate) under the City of Santa Clarita General Plan. The proposal is to prezone the project site to RE (Residential Estate) on 811 acres and RM (Residential Moderate) on 14 acres to allow for a sphere of influence amendment and annexation of the area.

Based on the information contained in the Initial Study prepared for this project, and pursuant to the requirements of Section 15065 of the California Environmental Quality Act (CEQA), the City of Santa Clarita

☒ City Council   ☐ Planning Commission   ☐ Director of Planning and Building Services

finds that the project as proposed or revised will have no significant effect upon the environment, and that a Negative Declaration shall be adopted pursuant to Section 15070 of CEQA.

Mitigation measures for this project

☒ Are Not Required   ☐ Are Attached   ☐ Are Not Attached

VINCENT P. BERTONI, AICP  
PLANNING MANAGER

Prepared by:   
(Signature)

Kelvin Parker, Associate Planner  
(Name/Title)

Approved by:   
(Signature)

Vincent P. Bertoni, AICP, Planning Manager  
(Name/Title)

Public Review Period From December 17, 2002 to January 8, 2003  
Public Notice Given On   December 17, 2002

☒ Legal Advertisement   ☒ Posting of Properties   ☒ Written Notice

CERTIFICATION DATE:

S:\PBS\Annex\SSCA\environmental\NegDec.doc





ENVIRONMENTAL ASSESSMENT  
(Initial Study Form B)  
CITY OF SANTA CLARITA



**Lead Agency:** City of Santa Clarita

**Contact Person & Phone Number:** Kelvin Parker, Associate Planner  
City of Santa Clarita Dept. of Planning & Building Services  
(661) 255-4330

**Master Case or CIP Number:** MC 02-474 (PRZ 02-004; ANX 02-004)

**Entitlement Type(s):** Sphere of Influence Amendment, Prezone & Annexation

**Project Introduction:** This CEQA-required Initial Study has been prepared for the proposed Prezone 02-004 for the proposed South Santa Clarita Annexation consisting of approximately 825 acres located in unincorporated Los Angeles County. The project site is currently designated RE (Residential Estate) on 811 acres and RM (Residential Moderate) on 14 acres under the City of Santa Clarita General Plan. The proposal is to prezone the project site to City of Santa Clarita RE (Residential Estate) designation on 811 acres and RM (Residential Moderate) designation on 14 acres to allow for a sphere of influence amendment and annexation of the area.

**Project Location:** The project site is generally located in the unincorporated area of the County of Los Angeles, adjacent to the southern boundary of the City of Santa Clarita, east of Interstate 5 and west of State Route 14.

**General Plan Designation (s):** Because the property is located in unincorporated Los Angeles County, the property is currently designated HM (Hillside Management), TC (Transportation Corridor), W (Watershed), and Urban 3 (6.7 to 15du/ac) under the Los Angeles County Santa Clarita Valley Areawide General Plan.

The existing City of Santa Clarita General Plan land use designation is RE (Residential Estate) and RM (Residential Moderate) on the project site.

**Zoning Designation(s):** The property is currently zoned in the Los Angeles County Zoning Code as A-2-1.

This proposal includes a City of Santa Clarita prezone to RE (Residential Estate) and RM (Residential Moderate) designations consistent with the City's General Plan.

**Project Applicant:  
(Name, Address, Phone)**

City of Santa Clarita  
Attn: Kelvin Parker, Associate Planner  
Department of Planning & Building Services  
23920 W. Valencia Blvd., Suite 300  
Santa Clarita, CA 91355

Phone: (661) 255-4330  
Fax: (661) 259-8125  
E-mail: kparker@santa-clarita.com

**Project Description and Setting:** No development of the project site is proposed at this time. The City is proposing to prezone the project site RE (Residential Estate) on 811 acres and RM (Residential Moderate) on 14 acres to the land use zone consistent with the General Plan to allow for a sphere of influence amendment and annexation to the City of Santa Clarita.

**Surrounding Land Uses & Setting:** The site is located immediately east of Interstate 5, west of the Antelope Valley Freeway (SR 14), just outside the City of Santa Clarita southern jurisdictional limits in the unincorporated County of Los Angeles. The property to the north is developed and undeveloped City of Santa Clarita. The property to the west, south, and east are undeveloped freeway easements.

**Other public agencies whose approval is required, (eg. permits, financing, approval, or participation agreement):** Local Agency Formation Commission  
Los Angeles County  
700 North Central Avenue, Suite 350  
Glendale, CA 91203

### ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Potentially Significant Impact Unless Mitigation Incorporated" as indicated by the checklist on the following pages.

- |                                                               |                                                             |                                                          |
|---------------------------------------------------------------|-------------------------------------------------------------|----------------------------------------------------------|
| <input type="checkbox"/> Land Use and Planning                | <input type="checkbox"/> Transportation/<br>Circulation     | <input type="checkbox"/> Public Services                 |
| <input type="checkbox"/> Population and Housing               | <input type="checkbox"/> Biological Resources               | <input type="checkbox"/> Recreation                      |
| <input type="checkbox"/> Geological Problems                  | <input type="checkbox"/> Noise                              | <input type="checkbox"/> Aesthetics                      |
| <input type="checkbox"/> Water                                | <input type="checkbox"/> Hazards                            | <input type="checkbox"/> Cultural Resources              |
| <input type="checkbox"/> Stormwater Management<br>& Recycling | <input type="checkbox"/> Mandatory Tests of<br>Significance | <input type="checkbox"/> Utilities and Service<br>System |
| <input type="checkbox"/> Air Quality                          | <input type="checkbox"/> Energy and Mineral<br>Resources    |                                                          |

### DETERMINATION:

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant impact on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a significant effect(s) on the environment, but at least one effect 1) has been mitigated adequately in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An ENVIRONMENTAL IMPACT REPORT, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project.

Prepared By:

  
(Signature)


Kelvin Parker  
Associate Planner

(Name/Title)

12-17-02

(Date)

Approved By:

  
(Signature)

Vincent P. Bertoni, AICP  
Planning Manager

(Name/Title)

12-17-02

(Date)

## ENVIRONMENTAL IMPACTS:

|                                                                                                                                       | Potentially<br>Significant<br>Impact | Potentially<br>Significant<br>Impact<br>Unless<br>Mitigation<br>Incorporated | Less than<br>Significant<br>Impact | No<br>Impact                        |
|---------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------------------------|------------------------------------|-------------------------------------|
| I. LAND USE AND PLANNING. Would the proposal:                                                                                         |                                      |                                                                              |                                    |                                     |
| a) Conflict with general plan designation or zoning?                                                                                  | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project?                   | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Be incompatible with existing land use in the city?                                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?             | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Affect a Significant Ecological Area (SEA)?                                                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Other:                                                                                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| II. POPULATION AND HOUSING. Would the proposal:                                                                                       |                                      |                                                                              |                                    |                                     |
| a) Cumulatively exceed official regional or local population projections?                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Create a net loss of jobs?                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Displace existing housing, especially affordable housing?                                                                          | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Other _____                                                                                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| III. GEOLOGIC PROBLEMS. Will the proposal result in:                                                                                  |                                      |                                                                              |                                    |                                     |
| a) Unstable earth conditions or in changes in geologic substructures?                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Disruptions, displacements, compaction or overcovering of the soil?                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Change in topography or ground surface relief features?                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) The destruction, covering or modification of any unique geologic or physical features?                                             | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Any increase in wind or water erosion of soils, either on or off the site?                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Exposure of people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards? | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Changes in deposition, erosion or siltation?                                                                                       | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| h) Other modification of a wash, channel, creek, or river?                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| i) Earth movement (cut and/or fill) of 10,000 cubic yards or more?                                                                    | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| j) Development and/or grading on a slope greater than 25% natural grade?                                                              | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| k) Development within the Alquist-Prilo Special Studies Zone?                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                                                                                                               | Potentially<br>Significant<br>Impact | Potentially<br>Significant<br>Impact<br>Unless<br>Mitigation<br>Incorporated | Less than<br>Significant<br>Impact | No<br>Impact                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------------------------|------------------------------------|-------------------------------------|
| l) Other _____                                                                                                                                                                                                                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| IV. WATER. Would the proposal result in:                                                                                                                                                                                                                                      |                                      |                                                                              |                                    |                                     |
| a) Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?                                                                                                                                                                                  | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Exposure of people or property to water-related hazards such as flooding?                                                                                                                                                                                                  | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Discharge into surface waters or other alteration of surface water quality (e.g. temperature, dissolved oxygen, or turbidity)                                                                                                                                              | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Changes in the amount of surface water in any water body?                                                                                                                                                                                                                  | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Changes in currents, or the course or direction of water movements?                                                                                                                                                                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Changes in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations or through substantial loss of groundwater recharge capability?                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Altered direction or rate of flow of groundwater?                                                                                                                                                                                                                          | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| h) Impacts to groundwater quality?                                                                                                                                                                                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| i) Substantial reduction in the amount of groundwater otherwise available for public water supplies?                                                                                                                                                                          | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| j) Other _____                                                                                                                                                                                                                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| V. STORMWATER MANAGEMENT AND RECYCLING.<br>Would the proposal result in:                                                                                                                                                                                                      |                                      |                                                                              |                                    |                                     |
| a) Storm water system discharges from areas for materials storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas? | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Significant environmentally harmful increase in the flow rate or volume or volume of storm water runoff?                                                                                                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Significant and environmentally harmful increases in erosion of the project site or surrounding areas?                                                                                                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Storm water discharges that would significantly impair the beneficial uses of receiving waters or areas that provide water quality benefits (e.g., riparian corridors, wetlands, etc.)?                                                                                    | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Cause harm to the biological integrity of drainage systems and water bodies?                                                                                                                                                                                               | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Does the proposed project include provisions for the separation and reuse of materials?                                                                                                                                                                                    | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| VI. AIR QUALITY. Would the proposal:                                                                                                                                                                                                                                          |                                      |                                                                              |                                    |                                     |
| a) Violate any air quality standard or contribute to an existing or projected air quality violation?                                                                                                                                                                          | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

|                                                                                                                                               | Potentially<br>Significant<br>Impact | Potentially<br>Significant<br>Impact<br>Unless<br>Mitigation<br>Incorporated | Less than<br>Significant<br>Impact | No<br>Impact                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------------------------|------------------------------------|-------------------------------------|
| b) Expose sensitive receptors to pollutants?                                                                                                  | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Create objectionable odors?                                                                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Other _____                                                                                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| VII. TRANSPORTATION/CIRCULATION. Would the proposal result in:                                                                                |                                      |                                                                              |                                    |                                     |
| a) Increased vehicle trips or traffic congestion?                                                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Hazards to safety from design features (e.g. sharp curves or dangerous intersections) or incompatible uses?                                | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Inadequate emergency access or access to nearby uses?                                                                                      | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Insufficient parking capacity onsite or offsite?                                                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Hazards or barriers for pedestrians or bicyclists?                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Conflicts with adopted policies supporting alternative transportation (e.g. bus stops, bicycle racks)?                                     | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Disjointed pattern of roadway improvements                                                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| h) Other _____                                                                                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| VIII. BIOLOGICAL RESOURCES. Would the proposal result in impacts to:                                                                          |                                      |                                                                              |                                    |                                     |
| a) Endangered, threatened or rare species or their habitats (including but not limited to plants, fish, insects, animals, and birds)?         | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Oak trees?                                                                                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Wetland habitat or blue-line stream?                                                                                                       | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Wildlife dispersal or migration corridors?                                                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Other _____                                                                                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| IX. ENERGY AND MINERAL RESOURCES. Would the proposal:                                                                                         |                                      |                                                                              |                                    |                                     |
| a) Conflict with adopted energy conservation plans?                                                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Use nonrenewable resources in a wasteful and inefficient manner?                                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State? | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Other _____                                                                                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| X. HAZARDS. Would the proposal involve:                                                                                                       |                                      |                                                                              |                                    |                                     |
| a) A risk of accidental explosion or release of hazardous substances (including but not limited to oil, pesticides, chemicals, or radiation)? | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Possible interference with an emergency response plan or emergency evacuation plan?                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) The creation of any health hazard or potential health hazard?                                                                              | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

|                                                                                                                                                              | Potentially<br>Significant<br>Impact | Potentially<br>Significant<br>Impact<br>Unless<br>Mitigation<br>Incorporated | Less than<br>Significant<br>Impact | No<br>Impact                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------------------------|------------------------------------|-------------------------------------|
| d) Exposure of people to existing sources of potential health hazards (e.g. electrical transmission lines, gas lines, oil pipelines)?                        | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Increased fire hazard in areas with flammable brush, grass, or trees?                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Other _____                                                                                                                                               | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| <b>XI. NOISE.</b> Would the proposal result in:                                                                                                              |                                      |                                                                              |                                    |                                     |
| a) Increases in existing noise levels?                                                                                                                       | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Exposure of people to severe noise levels or vibration?                                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Other _____                                                                                                                                               | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| <b>XII. PUBLIC SERVICES.</b> Would the proposal have an effect on, or result in a need for new or altered government services in any of the following areas: |                                      |                                                                              |                                    |                                     |
| a) Fire protection?                                                                                                                                          | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Police protection?                                                                                                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Schools?                                                                                                                                                  | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Maintenance of public facilities, including roads?                                                                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Other government services?                                                                                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| <b>XIII. UTILITIES.</b> Would the proposal result in a need for new systems or supplies, or substantial alterations to the following utilities:              |                                      |                                                                              |                                    |                                     |
| a) Power or natural gas?                                                                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Communications systems?                                                                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Local or regional water treatment or distribution facilities?                                                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Sewer or septic tanks?                                                                                                                                    | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Storm water drainage?                                                                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Solid waste disposal?                                                                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Local or regional water supplies?                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| h) Other _____                                                                                                                                               | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| <b>XIV. AESTHETICS.</b> Would the proposal:                                                                                                                  |                                      |                                                                              |                                    |                                     |
| a) Affect a scenic vista open to public view?                                                                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Have a negative aesthetic effect?                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Create light or glare?                                                                                                                                    | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Other _____                                                                                                                                               | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| <b>XV. CULTURAL RESOURCES.</b> Would the proposal:                                                                                                           |                                      |                                                                              |                                    |                                     |
| a) Disturb paleontological or archaeological resources?                                                                                                      | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Have the potential to cause a physical change which would affect unique ethnic cultural values?                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

|                                                                                 | Potentially<br>Significant<br>Impact | Potentially<br>Significant<br>Impact<br>Unless<br>Mitigation<br>Incorporated | Less than<br>Significant<br>Impact | No<br>Impact                        |
|---------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------------------------|------------------------------------|-------------------------------------|
| c) Restrict existing religious or sacred uses within the potential impact area? | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Affect a recognized historical site?                                         | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Other _____                                                                  | <input type="checkbox"/>             | <input type="checkbox"/>                                                     | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

#### XVI. RECREATION

|                                                                                                             |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Will the proposal result in an impact upon the quality or quantity of existing recreation opportunities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

#### XVII. MANDATORY FINDINGS OF SIGNIFICANCE

|                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one which occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future.)                                                                                                                                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Does the project have impacts which are individually limited but cumulatively considerable? (A project may impact on two or more separate resources where the impact on each resource is relatively small, but where the effect of the total of those impacts on the environment is significant.)                                                                                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?                                                                                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

#### XVIII. DEPARTMENT OF FISH AND GAME 'DE MINIMUS' FINDING

|                                                                                                                                                                                                                                                                                                                                                           |                          |                          |                          |                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Will the project have an adverse effect either individually or cumulatively, on fish and wildlife resources? Wildlife shall be defined for the purpose of this question as "all wild animals, birds, plants, fish, amphibians, and related ecological communities, including the habitat upon which the wildlife depends for its continued viability." | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|



**IXX. DISCUSSION OF ENVIRONMENTAL IMPACTS AND/OR EARLIER ANALYSES:**

| Section and Subsections             | Evaluation of Impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>I. LAND USE AND PLANNING</b>     | <p>No development is proposed with this prezone to RE and RM. No significant impact related to land use is expected. The proposed project includes annexation of approximately 825 acres of mostly undeveloped land located just outside the boundary of the City of Santa Clarita in the unincorporated area of County of Los Angeles. The prezone is consistent with the City of Santa Clarita General Plan designation of RE &amp; RM.</p> <p>The proposed prezone to RE &amp; RM on the project site is consistent with the following General Plan goals:</p> <p>L 3.5 Promote Santa Clarita's location along Interstate 5 and Highway 14 as an important link between southern and northern California, as the northern gateway to the metropolitan Los Angeles area, and as a self-sufficient community and center serving the broader region. (L29)</p> <p>4.14 Maintain and/or enhance the character of the various communities through compatible land use standards and design guidelines, while promoting a overall identity for the Santa Clarita Valley. (L-31)</p> <p>L 7.6 Coordinate annexation activities with City growth management strategies. (L-34)</p> <p>H 1.2 Evaluate development proposals within the unincorporated portions of the planning area to ensure that development is consistent with both the City's and the County's land use plan. (H-59)</p> <p>ED 2.7 Seek a City Sphere of Influence consistent with the planning area of this General Plan. (ED-25)</p> <p>The proposed prezone and annexation would not disrupt or divide the physical arrangement or an established community because there is no development associated with this proposal. For the reasons stated above, impacts upon Land Use and Planning are anticipated to be less than significant and no further analysis is warranted at this time.</p> |
| <b>II. POPULATION &amp; HOUSING</b> | <p>The City of Santa Clarita General Plan serves as the basis for local population projections in the Santa Clarita General Plan Planning area. The proposed Prezone to RE &amp; RM for the South Santa Clarita Annexation has no impact upon population and housing because it will not lead to growth. No development is proposed with this project. In addition, the Prezone will not lead to a loss of jobs or displace existing housing because no development is proposed. Impacts from the Prezone upon Population and Housing are anticipated to be less than significant.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| Section and Subsections                         | Evaluation of Impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>III. GEOLOGIC PROBLEMS</b>                   | The proposed Prezone to RE and RM would not create any significant impacts to geology. No development is proposed with this project. The proposal will not result in unstable earth conditions or changes in geologic substructures, disruptions, displacements, compaction or overcovering of the soil, changes in topography or ground surface relief features or the destruction, covering or modification of any unique geologic or physical features because no earth movement is proposed. In addition, the proposal will not result in any increase in wind or water erosion of soils either on or off the site, nor expose people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards. The proposal will not result in a change in deposition, erosion or siltation, modify a wash, channel, creek or river. No Alquist-Priolo Special Study Zones exist on the property. For the reasons stated above, no impacts upon Geologic Problems are anticipated and no further analysis is required. |
| <b>IV. WATER</b>                                | The proposed Prezone to RE & RM will not change the absorption rates, drainage patterns, or the rate and amount of surface runoff, nor will it expose people or property to water related hazards such as flooding because no development is proposed. The Prezone proposal will not discharge additional debris or water into surface waters or result in an alteration to surface water quality (e.g. temperature, dissolved oxygen, or turbidity). This proposed Prezone will not result in changes in currents, or the course or direction of water movements, change in the amount of surface water in any water body, nor affect groundwater in any way because the Prezone will result in no physical changes to the property. For the reasons stated above, no impacts upon Water are anticipated and no further analysis is required.                                                                                                                                                                                                                    |
| <b>V. STORMWATER MANAGEMENT &amp; RECYCLING</b> | The proposed Prezone to RE & RM would not create any significant impacts to storm water management and recycling. Before annexation, property owners would elect to pay an annual City of Santa Clarita Storm Water Drainage Fee prior to, and as a prerequisite to annexation. The property would remain natural open space.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>VI. AIR QUALITY</b>                          | The proposed Prezone to RE and RM would not create any adverse air quality impacts because no development is proposed with this project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>VII. TRANSPORTATION/ CIRCULATION</b>         | The proposed Prezone to RE and RM would not generate any traffic/access related impacts because no development is proposed with this project. The project site takes access from The Old Road and Wildwood Canyon Road. The project is located adjacent to Interstate 5 and State Route 14, the Antelope Valley Freeway. The proposed Prezone would not increase vehicle trips or traffic congestion, result in hazards to safety from design features or incompatible uses, result in inadequate emergency access or access                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| Section and Subsections                 | Evaluation of Impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                         | to nearby uses, result in insufficient parking capacity onsite or offsite, result in hazards or barriers to pedestrians or bicyclists, conflict with adopted policies supporting alternative transportation or result in a disjointed pattern of roadway improvements. Therefore, no impacts to transportation/circulation are anticipated and no further analysis is required.                                                                                                                                                                                                                                                                                                                                      |
| <b>VIII. BIOLOGICAL RESOURCES</b>       | The proposed Prezone to RE and RM would not generate any adverse impacts on biological resources, which include impacts to endangered, threatened, or rare species, oak trees, wetland habitat or blue line stream, or wildlife dispersal or migration corridors. No development is proposed with this project. No vegetation or animal life would be removed or altered as a result of the proposed and Prezone.                                                                                                                                                                                                                                                                                                    |
| <b>IX. ENERGY AND MINERAL RESOURCES</b> | <p>The proposed Prezone to RE and RM would not generate impacts on energy or mineral resources. No development is proposed with this project.</p> <p>The project contains power line easements for the Los Angeles City Department of Water and Power that will not be affected by the proposed Prezone. No impact to energy and mineral resources is anticipated.</p>                                                                                                                                                                                                                                                                                                                                               |
| <b>X. HAZARDS</b>                       | This Prezone to RE and RM will not result in a risk of accidental explosion or release of hazardous substances (including but not limited to oil, pesticides, chemicals, or radiation) because it does not involve any construction. This is the same reason that the proposed Prezone would not interfere with an emergency response plan or emergency evacuation plan, nor create any health hazard or potential health hazard. Although there are power lines across portions of the project site, these lines would not expose people to a health hazard because no development would occur. The proposal will not increase fire hazard in this area. Therefore, this project will have no impacts upon Hazards. |
| <b>XI. NOISE</b>                        | The proposed Prezone to RE and RM does not include any development activity. Therefore, this project would not result in any increase in the existing noise levels or exposure of people to severe noise levels or vibration. No impact to Noise is anticipated.                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>XII. PUBLIC SERVICES</b>             | The proposed Prezone to RE and RM would not have an effect on, or result in an incremental need for new or altered governmental services including fire protection, police protection, schools, maintenance of public facilities (including roads) or other governmental services because no development is proposed. Part of the project proposal is an authorization for the City to apply to LAFCO for annexation. An annexation would result in an incremental increase in the governmental responsibilities for the City including roadway maintenance for The Old Road. The City would also                                                                                                                    |

| Section and Subsections       | Evaluation of Impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                               | provide police protection in this area upon annexation. The annexation would result in a negotiated revenue neutral tax transfer between the City of Santa Clarita and the County of Los Angeles to fund public services. Impacts from a Prezone to Public Services are anticipated to be less than significant.                                                                                                                                                                              |
| <b>XIII. UTILITIES</b>        | The proposed Prezone to RE and RM would not result in a need for new systems or supplies, or substantial alterations to power, natural gas, communications systems, local or regional water treatment or distribution facilities, sewer or septic tanks, storm water drainage, solid waste disposal, and local or regional water supplies because no physical changes are proposed on the site as part of the and Prezone. No impact to Utilities is anticipated as a result of this project. |
| <b>XIV. AESTHETICS</b>        | The proposed Prezone to RE and RM would not create any adverse impacts to aesthetics. No development is proposed with this project.                                                                                                                                                                                                                                                                                                                                                           |
| <b>XV. CULTURAL RESOURCES</b> | This proposed Prezone would not disturb paleontological resources, archaeological resources, or cause a physical change which would affect unique ethnic cultural values because no physical changes would occur on the site as part of this Prezone proposal. For these reasons, the proposal would not restrict existing religious or sacred uses within the project area or affect a recognized historical site. No impacts to Cultural Resources are anticipated.                         |
| <b>XVI. RECREATION</b>        | The proposed Prezone to would not create any significant adverse impacts to recreation.                                                                                                                                                                                                                                                                                                                                                                                                       |

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AR # 85

CITY OF SANTA CLARITA  
AGENDA REPORT

City Manager Approval *[Signature]*

Item to be presented by: Vince Bertoni

NEW BUSINESS

DATE: December 10, 2002

SUBJECT: RESOLUTION TO FILE AN APPLICATION WITH LAFCO FOR ANNEXATION 2002-04 FOR THE PROPOSED SOUTH SANTA CLARITA ANNEXATION, LOCATED OUTSIDE THE SOUTHERN BOUNDARY OF THE CITY LIMITS GENERALLY EAST OF INTERSTATE 5 AND WEST OF STATE ROUTE 14.

DEPARTMENT: Planning and Building Services

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RECOMMENDED ACTION

City Council to adopt the Resolution authorizing the City Manager, or designee, to file an annexation and sphere of influence amendment application with the Local Agency Formation Commission (LAFCO) for the proposed South Santa Clarita Annexation.

BACKGROUND

This action authorizes the City Manager, or designee, to file an annexation application for the South Santa Clarita Annexation consisting of approximately 825 acres of inhabited land, including 129 acres of Caltrans right-of-way area.

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (ACT) and LAFCO regulate annexation to the City. Annexation of the project area would encourage sound planning, well-ordered urban development patterns, and a logical boundary pursuant to these regulations. Filing the application at this time would initiate the annexation process with the Local Agency Formation Commission (LAFCO) and allow the project to proceed in a timely manner.

The project site is contiguous to the southern boundary of the City limits, east of Interstate 5, and west of State Route 14, creating a logical boundary for annexation to the City. In addition, proximity of the project area to the City would allow for the most efficient provision of municipal services logistically convenient to present and future residents of the project area. This area includes the proposed 555 acre Las Lomas development, which has an application to the City of Los Angeles for approval of a large development project, but to date, does not have an active annexation application with LAFCO, as well as a mobile home park and several

Agenda Item: 14

other properties. City staff has begun contacting all property owners in the affected annexation area to inform them of the annexation process. The Council's action tonight is the beginning of a lengthy annexation process and the affected property owners will have additional opportunities to express whether they wish to have their properties included in the annexation area.

#### FISCAL IMPACT

A fiscal impact analysis for the project will be prepared prior to annexation. The Stormwater Utility Election will be scheduled prior to recordation of the annexation.

#### ALTERNATIVE ACTIONS

1. Council may choose not to adopt Resolution and not submit application to annex the proposed annexation area.
2. Other direction as determined by the City Council.

#### ATTACHMENTS

Resolution  
Exhibit A-Location Map

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RESOLUTION 02-

A RESOLUTION OF APPLICATION BY THE CITY COUNCIL  
OF THE CITY OF SANTA CLARITA, CALIFORNIA,  
REQUESTING THAT THE LOCAL AGENCY FORMATION COMMISSION  
OF LOS ANGELES COUNTY INITIATE PROCEEDINGS FOR  
THE PROPOSED ANNEXATION OF CERTAIN INHABITED TERRITORY  
TO THE CITY OF SANTA CLARITA  
(SOUTH SANTA CLARITA ANNEXATION)

WHEREAS, the City of Santa Clarita desires to initiate proceedings pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, Division 3, commencing with Section 56000 of the California Government Code, for annexation; and

WHEREAS, the territory proposed to be annexed is inhabited, and a map of the boundaries is set forth in Exhibit A attached and by this reference incorporated; and

WHEREAS, the short form designation of the proposal is Annexation No. 2002-04; and

WHEREAS, this proposal is inconsistent with the City of Santa Clarita's Sphere of Influence as designated by the Local Agency Formation Commission on July 24, 2001, and would require amending thereof pursuant to this proposal; and

WHEREAS, the reasons for this proposed annexation are to promote sound planning and land use practices in the affected territory; and

WHEREAS, the City Council of the City of Santa Clarita has considered all evidence, oral and documentary, and is advised of the foregoing.

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Santa Clarita, California, does hereby determine and find as follows:

**SECTION 1.** This Resolution of Application is hereby adopted by the City Council, and the Local Agency Formation Commission of Los Angeles County is hereby requested to initiate proceedings for the annexation of that territory mapped in Exhibit A, incorporated by this reference, according to the terms and conditions stated above, if any, by the commission and the City, and in the manner provided the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

**SECTION 2.** The City Council hereby directs and authorizes the City Manager, or designee, to file the application with LAFCO on behalf of the City Council.

**SECTION 3.** The City Council hereby directs and authorizes the City Clerk of the City of Santa Clarita to forward a certified copy of this Resolution with applicable fees and other information as required by Section 56383 of the Government Code to the Executive Officer of the Local Agency Formation Commission of Los Angeles County.

**SECTION 4.** The City Clerk shall certify to the adoption of this resolution and certify this record to be a full, true, correct copy of the action taken.



PASSED, APPROVED AND ADOPTED this \_\_\_\_\_ day of \_\_\_\_\_,  
2002.

\_\_\_\_\_  
MAYOR

ATTEST:

\_\_\_\_\_  
CITY CLERK

STATE OF CALIFORNIA       )  
COUNTY OF LOS ANGELES   )  
CITY OF SANTA CLARITA     )

I, Sharon L. Dawson, City Clerk of the City of Santa Clarita, do hereby certify that the foregoing Resolution was duly adopted by the City Council of the City of Santa Clarita at a regular meeting thereof, held on the \_\_\_\_ day of \_\_\_\_\_, 2002 by the following vote of the Council:

AYES:       COUNCILMEMBERS:

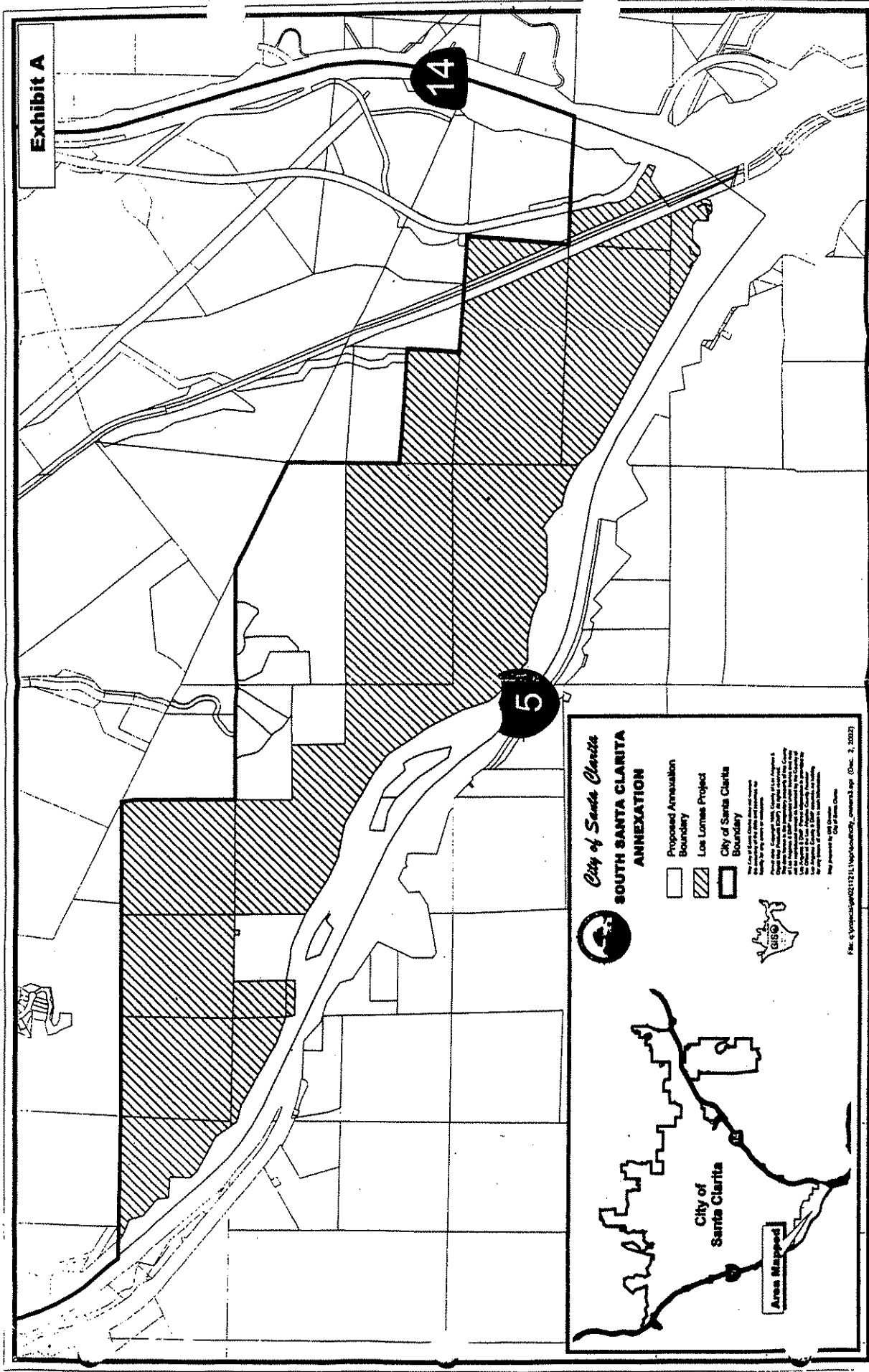
NOES:       COUNCILMEMBERS:

ABSENT:     COUNCILMEMBERS:

\_\_\_\_\_  
CITY CLERK

annex\SSCA\apres

**Exhibit A**



**City of Santa Clarita**

**SOUTH SANTA CLARITA**

**ANNEXATION**

- Proposed Annexation Boundary
- Los Lomas Project
- City of Santa Clarita Boundary

The City of Santa Clarita does not warrant the accuracy of the map or the information contained herein. The City of Santa Clarita is not responsible for any errors or omissions. The City of Santa Clarita is not responsible for any damages, including consequential damages, arising from the use of this map. The City of Santa Clarita is not responsible for any damages, including consequential damages, arising from the use of this map.

**Area Map**

**City of Santa Clarita**

File: C:\projects\g021121\Map\Annexation\annex3.apr (Dec. 2, 2007)



CITY OF SANTA CLARITA  
NEGATIVE DECLARATION

☒ Proposed ☐ Final

=====

MASTER CASE NO:

MC 02-474

PERMIT/PROJECT  
NAME:

Prezone 02-004; Annexation 02-004

APPLICANT:

City of Santa Clarita  
Department of Planning and Building Services  
23920 Valencia Blvd., Suite 300  
Santa Clarita, CA 91355  
Contact Person: Kelvin Parker, Associate Planner

LOCATION OF THE  
PROJECT:

The project site is generally located east of Interstate 5 and west of State Route 14, adjacent to and outside the southern existing limits of the City of Santa Clarita in the unincorporated area of County of Los Angeles.

DESCRIPTION OF  
THE PROJECT:

A proposal for a Prezone for a mostly undeveloped site known as the South Santa Clarita Annexation located in unincorporated Los Angeles County. The project site is currently designated RE (Residential Estate) and RM (Residential Moderate) under the City of Santa Clarita General Plan. The proposal is to prezone the project site to RE (Residential Estate) on 811 acres and RM (Residential Moderate) on 14 acres to allow for a sphere of influence amendment and annexation of the area.

=====

Based on the information contained in the Initial Study prepared for this project, and pursuant to the requirements of Section 15065 of the California Environmental Quality Act (CEQA), the City of Santa Clarita

☒ City Council ☐ Planning Commission ☐ Director of Planning and Building Services

finds that the project as proposed or revised will have no significant effect upon the environment, and that a Negative Declaration shall be adopted pursuant to Section 15070 of CEQA.

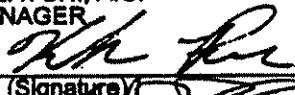
Mitigation measures for this project

☒ Are Not Required ☐ Are Attached ☐ Are Not Attached

=====

VINCENT P. BERTONI, AICP  
PLANNING MANAGER

Prepared by:



Kelvin Parker, Associate Planner  
(Name/Title)

Approved by:



Vincent P. Bertoni, AICP, Planning Manager  
(Name/Title)

=====

Public Review Period From February 4 to February 25, 2003  
Public Notice Given On February 4, 2003

☒ Legal Advertisement ☒ Posting of Properties ☒ Written Notice

CERTIFICATION DATE:

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02 0004263



PR#127

**NEGATIVE DECLARATION  
SOUTH SANTA CLARITA ANNEXATION  
PREZONE 02-004; ANNEXATION 02-004  
(Initial Study Form B)  
City of Santa Clarita**

**Project Title/Master Case Number:** MC 02-474 (PRZ 02-004; ANX 02-004)

**Lead Agency name and address:** City of Santa Clarita  
23920 Valencia Blvd., Suite 300  
Santa Clarita, CA 91355

**Contact person and phone number:** Kelvin Parker, Associate Planner  
City of Santa Clarita Department of Planning &  
Building Services  
(661) 255-4330

**Project location:** The South Santa Clarita Annexation Area is located in the unincorporated area of the County of Los Angeles, adjacent to the southern boundary of the City of Santa Clarita, east of Interstate 5 and west of State Route 14.

**Applicant's name and address:** City of Santa Clarita  
Department of Planning & Building Services  
23920 W. Valencia Blvd., Suite 300  
Santa Clarita, CA 91355

**General Plan designation:** The 825-acre Annexation Area is currently located in unincorporated County of Los Angeles. Current land use designations include: HM (Hillside Management), TC (Transportation Corridor), W (Watershed), and Urban 3 (6.7 to 15 du/ac) under the Los Angeles County's Santa Clarita Valley Areawide General Plan, as shown in Figure 1.

The existing Santa Clarita General Plan land use designation is RE (Residential Estate) on 811 acres of the Annexation Area and RM (Residential Moderate) on 14 acres within the Annexation Area, as shown on Figure 2.

**Zoning:**

The Annexation Area is currently located in unincorporated County of Los Angeles. The Annexation Area is currently zoned as A-2-1 pursuant to Los Angeles County Zoning Code.

The annexation includes a City of Santa Clarita prezone to RE (Residential Estate) and RM (Residential Moderate) designations, consistent with the City's General Plan. See Figure 3.

**Description of project and setting:**

The City is proposing to prezone 811 acres of the Annexation Area RE (Residential Estate) and 14 acres of the Annexation Area RM (Residential Moderate). Existing uses within the Annexation Area are described more fully as part of the introduction that follows.

The proposed action consists solely of the annexation and pre zoning of the South Santa Clarita Annexation Area. There is no development plan that has been proposed which would depend on approval of the proposed annexation, nor is such a development plan reasonably foreseeable, as explained more fully as part of the introduction that follows. This annexation is in no way an essential part of a development plan by which a property owner intends to urbanize land currently zoned agricultural.

**Surrounding land uses:**

The site is located immediately east of Interstate 5, west of the Antelope Valley Freeway (State Route 14), just outside the City of Santa Clarita's southern jurisdictional limits in unincorporated County of Los Angeles. The property to the north is developed and undeveloped City of Santa Clarita.

**Other public agencies whose approval is required:**

Local Agency Formation Commission  
Los Angeles County  
700 North Central Avenue, Suite 350  
Glendale, CA 91203

**A. INTRODUCTION**

The City of Santa Clarita is proposing to annex an 825-acre area (South Santa Clarita Annexation) abutting the current City limits. There are approximately 38 property owners within the area included in the South Santa Clarita Annexation Area.

As shown in Figures 2 and 3, the South Santa Clarita Annexation Area is located in the triangle formed by the intersection of Interstate 5 (I-5) and State Route 14 (SR-14). Upon

**02 0004263**



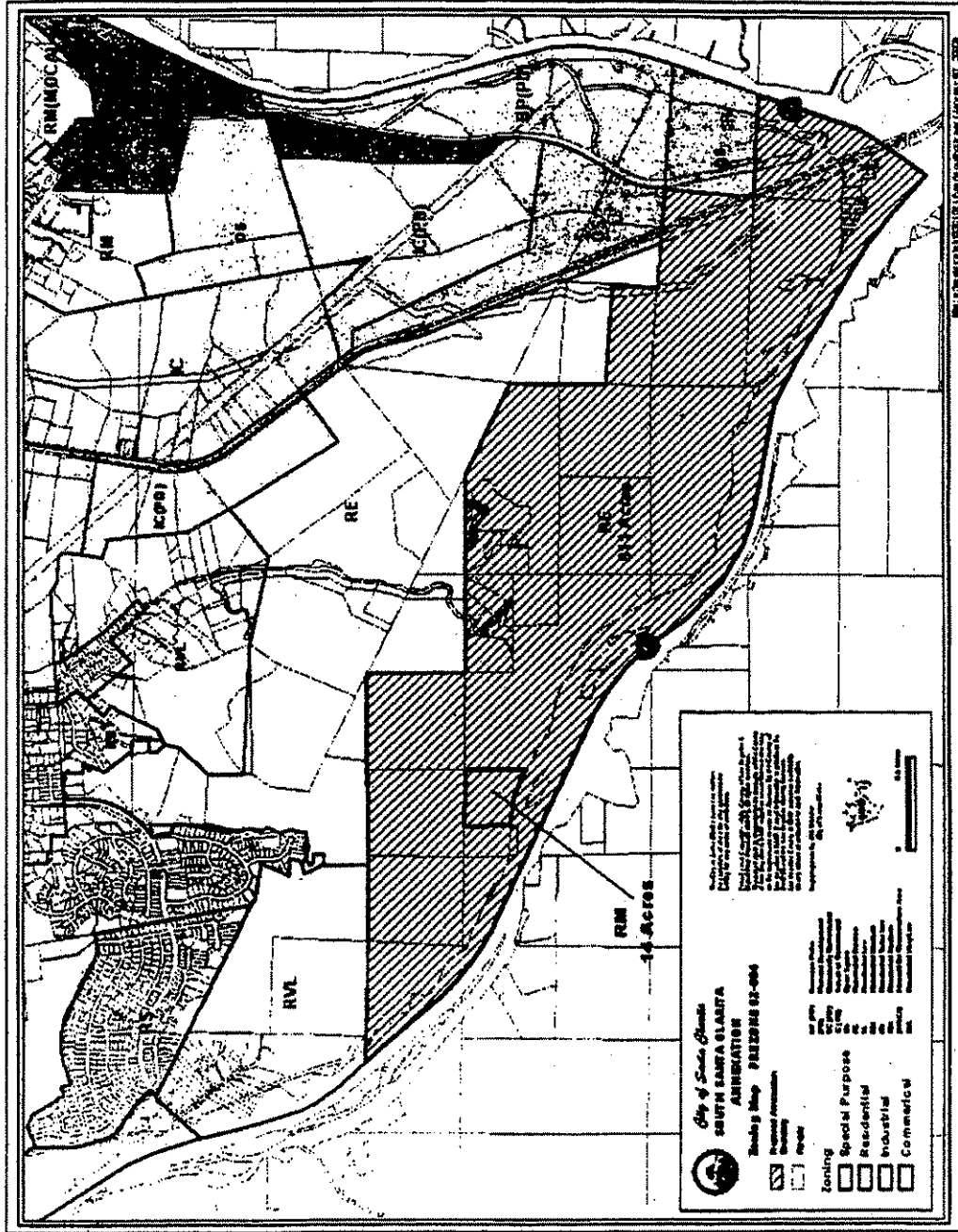


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**FIGURE 3 - SOUTH SANTA CLARITA ANNEXATION AREA AND PREZONING AND EXISTING ZONING IN THE SURROUNDING AREA**



approval of the annexation, the City's boundaries would extend to the centerline of the two freeways, in this area.

### EXISTING SETTING

The South Santa Clarita Annexation Area is currently located wholly within the County of Los Angeles.

A site survey of the area was conducted by City of Santa Clarita staff on January 28, 2003, to provide a more complete description of existing conditions within the South Santa Clarita Annexation Area:

#### The Old Road (traveling southbound)

- Mobile Home Park – The Crescent Valley Mobile Home Park is located roughly ¼ mile south of Towsley Canyon. This park consists of 81 mobile units and a recreation center. The property is situated alongside The Old Road with moderately dense vegetation buffering residences from the highway.
- Single Family Residence (SFR) – The next structure accessible from The Old Road is a single family residence located approximately ¼ mile south of the Mobile Home Park. In order to reach the main structure visitors must drive up a narrow tree lined road (unpaved), which leads to the house. It is important to note that there is a second road, Medford Avenue, which links the SFR with residents living in the northern part of the South Santa Clarita Annexation Area.
- Woodpiles – There are two (2) relatively large woodpiles located along The Old Road. They are just north of the vehicle storage area described below. The piles are within 800-900 feet of each other.
- Vehicle Storage – This facility is located approximately ¼ mile south of the Single Family Residence described above (directly alongside the Old Road). Several parked cars and trucks can be seen from the highway as well as large storage bins. There are no aesthetic enhancements that shield the parking area from the highway. Everything is in plain sight.
- Paintball – Close Encounters Paintball is located next to the Vehicle Storage area. Some "playing fields" can be seen from alongside the highway. These essentially consist of 2-3 fenced enclosures, which of course shield passersby from stray paintballs. The area is largely wooded. Aerial maps indicate that there is an access road that leads to a clearing in the upper portion of the property. This appears to make the bulk of the paintball "playing fields."
- Beehives – There are 4-6 boxes located roughly 200-300 feet south of the Paintball property (alongside The Old Road). They appear to contain honeybees, raised for commercial purposes.

Wildwood Canyon Road

02 0004263

- Residential Estates - There are two (2) large residential estates located off of Wildwood Canyon Road. In order to reach the estates, visitors must gain access through a private gate. The area is largely rural and picturesque by most standards, i.e., tree shrouded roads, equestrian trails, expanses of green intermingled with a lush, rustic landscape. Aerial maps indicate that the homes may be accessible via Medford Avenue.
- Grazing Area - Aerial maps show a large clearing located just east of the residential estates. It appears to be used for animal grazing, most likely goats. The clearing is accessible via a private road.

#### Miscellaneous

- Natural Gas Pipelines - Pipelines run along the eastern portion of the Annexation Area.
- Railroad - The railroad cuts through the eastern portion as well. This section of the railroad is below ground. The tunnel begins north of the Annexation Area within the City of Santa Clarita and continues south through the mountains, surfacing within the City of Los Angeles. The tunnel is the San Fernando Tunnel (circa 1876). This tunnel has been deemed eligible for listing on the National Register of Historic Places.
- MWD Pipeline - The Metropolitan Water District Pipeline runs along a small segment of the eastern portion of the Annexation Area.
- Towers - Cellular, electric and water towers are located throughout the South Santa Clarita Annexation Area. All are accessible via trail or road.

#### OBJECTIVES OF THE ANNEXATION AND PREZONE

The primary objectives of the annexation and prezone are:

- To Normalize The City's Boundaries In This Area - Interstate 5 and the Antelope Valley Freeway (SR-14) form natural boundary lines, and in general mark the City's limits. However, in this area, the two freeways serve, instead, to isolate this sliver of unincorporated land from the larger portion of unincorporated Los Angeles County. The South Santa Clarita Annexation Area is thus more logically a part of the City of Santa Clarita, than unincorporated Los Angeles County, based on the presence of a logical physical dividing line. The annexation would normalize the City's boundaries in this area, such that in the southern half of the City, Interstate 5 would form the western boundary of the City, the intersection of the two freeways would form the southern boundary, and the Antelope Valley Freeway would form the eastern boundary of the City.

- **To Implement The City's General Plan** - Section 65300 of the California Government Code which requires the preparation of General Plans specifies that: "Each planning agency shall prepare and the legislative body of each county and city shall adopt a comprehensive, long-term general plan for the physical development of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning." The South Santa Clarita Annexation Area is within the planning area of the City's General Plan. As part of the annexation, and consistent with Government Code Section 65859, the Annexation Area would be prezoned to be consistent with the land use designation specified for this area in the City's General Plan.<sup>1</sup>
- **To Ensure Appropriate Limits On The Allowable Density Of Development In The South Santa Clarita Annexation Area** - The land use designations for the South Santa Clarita Annexation Area included in the City's General Plan were established based on an understanding of the environmental resources contained within the area.<sup>2</sup> These limits are similar to those imposed by the current County zoning and land use designations. The reasons for these limitations in that area include the presence of important scenic resources, including a primary ridgeline, which forms the spine of the Annexation Area.<sup>3</sup> At least 40 percent of the Annexation Area contains slopes of greater than 50 percent, and at least 59 percent of the area contains slopes of 25 percent or greater.<sup>4</sup> Natural vegetation includes semi-desert chaparral, and areas containing coast live oak woodland are also present in the South Santa Clarita Annexation Area.<sup>5</sup> The Annexation Area also includes a watershed, and a portion of the Annexation Area is within a Significant Ecological Area.<sup>6</sup> The Annexation Area lies at the intersection of the two major freeways that connect the Santa Clarita Valley with the remainder of Los Angeles County. The economic health of the Santa Clarita Valley rests in part on ensuring the proper flow of people and goods on these important access corridors. Given the environmental constraints in the area, environmentally sensitive development means low density development. Annexation would give the City's decision-makers a greater voice in ensuring that any future development in the Annexation Area is sensitive to the existing environmental constraints.

#### **Allowable Development Density**

The South Santa Clarita Annexation Area is currently located within unincorporated Los Angeles County. The Annexation Area is currently zoned as A-2-1 pursuant to Los Angeles County Zoning Code. A-2-1 zoning allows for development of up to 1 dwelling unit per acre. Current zoning would allow for development of up to 825 dwelling units within the Annexation Area.

<sup>1</sup> Government Code Section 65860 requires that zoning be consistent with a City's General Plan.

<sup>2</sup> See for example the City of Santa Clarita General Plan Background Report. December 1990.

<sup>3</sup> Figure 5.10-1. Circulation Element Amendment EIR.

<sup>4</sup> Based on information contained in the Notice of Preparation for the Las Lomas Project, which is attached. According to the NOP, 60% (or 333) of the 555 acres Las Lomas site has slopes of over 50% and 27% (or 149.85) of the 555 acres contain slopes of between 25 and 50%. Thus 482 acres of the Las Lomas site include slopes of 25 % or greater.

<sup>5</sup> Figure 5.4-3. Circulation Element Amendment EIR.

<sup>6</sup> Figure OS-2. City of Santa Clarita General Plan.

The County land use designations for the Annexation Area include, TC (Transportation Corridor) and W (Watershed). The portion of the Annexation Area shown on Figure 2 as RM, has a County designation of Urban 3, which allows 6.7 to 15 dwelling units per acre. The remainder of the Annexation Area is designated HM (Hillside Management). The HM designation would limit development in areas with slopes of over 50 percent to 1 dwelling unit per 20 acres. In areas with slopes of less than 50 percent, development would be limited to 1 dwelling unit per 2 acres. The County's current land use designations are estimated to allow for development of up to 466 dwelling units within the South Santa Clarita Annexation Area.<sup>7</sup>

Prezoning consistent with the land use designations for the South Santa Clarita Annexation Area included in the City's General Plan would result in 811 acres of the 825-acre Annexation Area being zoned RE (Residential Estate) and 14 acres of the Annexation Area being zoned RM (Residential Moderate). RE zoning allows for development of up to 0.5 dwelling units per acre, which is the same as what is currently allowed under the County's HM designation, for portions of the area with slopes of less than 50 percent. The City RM prezoning would allow for development of up to 11 dwelling units per acre, slightly less than the maximum allowed under the County's current Urban 3 zoning. Development consistent with the City's proposed prezoning would thus allow for development of a maximum of 560 dwelling units, in the event the area was eventually builtout, consistent with the City's General Plan.<sup>8</sup>

However, given the presence of a primary ridgeline and significant slopes within the South Santa Clarita Annexation Area, any future development within the Annexation Area would be subject to the City's Ridgeline Preservation and Hillside Development Ordinance, which provides a sliding scale of allowable density reductions, based on slope. Based on available information about existing slopes in the South Santa Clarita Annexation Area, it is estimated that a maximum of 368 dwelling units could be constructed within the South Santa Clarita Annexation Area, with full buildout consistent with the City's General Plan and existing ordinances.<sup>9</sup>

The following table provides a summary of these density estimates.

---

<sup>7</sup> The maximum buildout potential may in fact be less, as slope percentage for the 270 acres of the annexation area, which are not included in the Las Lomas development proposal, are not known. The buildout potential of these 270 acres has been estimated as 210 du for the 14 acres that would be prezoned RM (based on maximum allowable density of 15 du/acre), and 128 du for the 256 acres that would be prezoned RE. The buildout potential for the Las Lomas site is estimated at 17 units for the 333 acres with slopes of greater than 50 percent and 111 dwelling units for 222 acres with slopes of less than 50 percent. The total is thus 466 dwelling units.

<sup>8</sup> This is the maximum buildout assumed in the City of Santa Clarita's General Plan EIR.

<sup>9</sup> The buildout potential for the Las Lomas site is estimated at between 34 and 86 du, based on slope information included in the NOP for the project. The slope percentage for the 270 acres of the annexation area, which are not included in the Las Lomas development proposal, are not known. The buildout potential of these 270 acres has been estimated as 154 du for the 14 acres that would be prezoned RM, and 128 du for the 256 acres that would be prezoned RE. The total given is thus 368 dwelling units.

| MAXIMUM ALLOWABLE DEVELOPMENT DENSITIES                                    |                                                                  |                                                               |
|----------------------------------------------------------------------------|------------------------------------------------------------------|---------------------------------------------------------------|
| JURISDICTION                                                               | COUNTY OF LOS ANGELES<br>DWELLING UNITS<br>PER ACRE<br>(DU/ACRE) | CITY OF SANTA CLARITA<br>DWELLING UNITS PER<br>ACRE (DU/ACRE) |
| Zoning (Prezoning)                                                         | 825                                                              | 560                                                           |
| Zoning (Prezoning) Plus Hillside<br>Development Restrictions <sup>10</sup> | 466                                                              | 368                                                           |

The Las Lomas Land Company has submitted an application the City of Los Angeles for annexation and development of the 555-acre Las Lomas portion of the South Santa Clarita Annexation Area.<sup>11</sup> There are currently approximately nine owners of property with land within the proposed Las Lomas annexation area. The area that applicant is requesting be annexed by the City of Los Angeles, does not abut the City of Los Angeles, which is located approximately 1,000 feet south of the Las Lomas site, on the other side of the intersection of the I-5 and Antelope Valley freeways, from the area Las Lomas is requesting be annexed by the City of Los Angeles. As shown in the Exhibit A of the Notice of Preparation for the Las Lomas annexation project, which is attached, the Las Lomas project would create small pockets of unincorporated land, between the City of Los Angeles and the City of Santa Clarita, if approved. As part of the Las Lomas annexation project, the applicant is proposing development of the following land uses on the 555-acre site:

- 5,800 dwelling units,
- 2,300,000 sf of Office/Research and Development,
- 250,000 sf of Community Facilities including a K-8 school,
- 225000 sf of Neighborhood Retail, and
- a 300-room hotel,
- which would require 20 million cubic yards of grading

The proposed Las Lomas development project is inconsistent with the City of Santa Clarita's General Plan land use designations, the County's zoning and land use designations, and would result in substantial grading and hillside alteration.

#### THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

<sup>10</sup> Hillside restrictions are the County's HM designation and the City's Ridgeline Preservation and Hillside Development Ordinance.

<sup>11</sup> A map of the area is included in the NOP for the Las Lomas development, which is attached.



This Negative Declaration (ND) for the South Santa Clarita Annexation and Prezone has been prepared in accordance with the California Environmental Quality Act (CEQA)<sup>12</sup> and the Guidelines for the Environmental Quality Act<sup>13</sup> (Guidelines). In preparing this ND, the City has erred on the side of an excess of caution, as the proposed action is not a project subject to CEQA. The City has thus sought to comply with the full disclosure spirit of CEQA.

**The Proposed Action Is Not A Project As Defined In CEQA**

In order to be subject to CEQA, and the requirement for the preparation of an environmental document to be triggered, an action must be a "project"<sup>14</sup> as defined in Section 21065 of the Public Resources Code as follows:

"Project" means an activity which may cause either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. (Emphasis added)

**A Direct Physical Change** - Is "a physical change in the environment which is caused by and immediately related to the project." (i.e. dust, noise, traffic, etc).<sup>15</sup>

**An Indirect Physical Change** - Is "a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment."<sup>16</sup> (i.e. construction of a new sewage treatment plant may facilitate population growth in the service area due to the increase in sewage treatment capacity and may lead to an increase in air pollution). The CEQA Guidelines specify that, "an indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable."<sup>17</sup>

The proposed annexation is not a project pursuant to Section 21065 of the Public Resources Code, and thus not subject to CEQA, since it will not result in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. An annexation that removes property from county control and places it under city control, is a project, if the annexation is an essential part of a development plan to urbanize property, and development under city control is anticipated in the foreseeable future.<sup>18</sup> An adjustment of a City's boundary is not a project "if that adjustment neither accommodates nor presages a change

<sup>12</sup> Public Resources Code 21000 et seq

<sup>13</sup> Sections 15000-15387 of the California Code of Regulations Title 15, Chapter 3

<sup>14</sup> Guidelines Section 15002(b) and (d).

<sup>15</sup> Per Section 15064(d)(1).

<sup>16</sup> Per Section 15064(d)(2).

<sup>17</sup> Per Section 15064(d)(3).

<sup>18</sup> See: Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263, 118 Cal.Rptr. 249, 529 P.2d 1017

in the type or extent of land use of the affected property,"<sup>19</sup> because it doesn't result in a direct change in the environment or have a foreseeable indirect change.

In the case of this proposed annexation, there is no reasonably foreseeable change in the environment that would result from the annexation. There is no development currently proposed, or reasonably anticipated to be proposed in the foreseeable future, which is, or would be, consistent with the rezoning that would occur as part of this annexation. It does not appear reasonably foreseeable that the Las Lomas Land Company would reduce the development proposal for their 555-acre site from, 5,800 dwelling units, 2,300,000 sf of Office/Research and Development, 250,000 sf of Community Facilities including a K-8 school, 225,000 sf of Neighborhood Retail, and a 300-room hotel, down to a development consisting solely of the between 34 to 86 dwelling units which would be allowable under the City's prezone and ordinances. (See footnote 9). Furthermore, none of the other approximately 23 property owners within the South Santa Clarita Annexation Area has a development project pending before the County, or has approached the City with a development project. Given the significant disparity between the level of development desired by the Las Lomas Land Company and the level that would be allowed with approval of the South Santa Clarita Prezone and Annexation, and the lack of any other reasonably anticipated development proposals from any of the approximately 23 other property owners within the South Santa Clarita Annexation Area, approval of the annexation is not anticipated to result in either a direct change to the environment or a reasonably foreseeable indirect physical change in the environment.

An annexation, such as this one, which is not linked to a development proposal, which does not increase the ultimate development capacity of the area to be annexed, and which merely serves to implement the land use designations in an adopted general plan, through rezoning, clearly will not result in any direct physical change in the environment. In the absence of a direct physical change in the environment, by definition, there is no indirect physical change. The proposed South Santa Clarita Annexation and prezone is therefore not a project, as defined in CEQA and the CEQA Guidelines.

#### **Approach Used In Preparing the CEQA Checklist**

Although the South Santa Clarita Annexation and associated rezoning is not subject to CEQA, the City has decided to prepare an Initial Study Checklist in order to better explain the relationship between the proposed action, the General Plan, prior environmental reviews of the General Plan, and subsequent environmental review requirements for any future development proposals.

#### **ND is Tiered From The General Plan EIRs**

As explained in Section 15152 of the CEQA Guidelines, tiering "refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project."

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<sup>19</sup> Ibid. page 83.

This ND is tiered from:

- Final Environmental Impact Report For The Santa Clarita General Plan, June 1991. State Clearinghouse Number: 90010683, and
- City of Santa Clarita Circulation Element Final Environmental Impact Report, September 1997. State Clearinghouse Number: 96112028.

Any future development within the South Santa Clarita Annexation Area would be subject to the following City Ordinances, as applicable. These ordinances have been designed to reduce the impacts of development within the City and to substantially mitigate environmental effects when applied to future projects:<sup>20</sup>

- Resolution 91-50 Local Guidelines and Procedures for Implementation of the Provisions of the California Environmental Quality Act of 1970.
- Ridgeline Preservation and Hillside Development Ordinance.
- Oak Tree Preservation Ordinance
- Integrated Waste Management Ordinance
- Standard Urban Stormwater Mitigation Plan Implementation Ordinance
- Stormwater and Urban Runoff Pollution Control Ordinance
- Floodplain Management Ordinance

These nine documents and the General Plan Background Report are incorporated herein by reference and are available for review at:

Planning Department of the City of Santa Clarita  
Santa Clarita City Hall  
23920 Valencia Boulevard, Suite 300  
Santa Clarita, California 91355-2196

#### **Tier 1 – City of Santa Clarita Plan-Level EIRs**

Although the South Santa Clarita Annexation and Prezone are not part of a development plan by a property owner, and are not anticipated to result in any reasonably foreseeable new development in the South Santa Clarita Annexation Area, in the long-term, over the life of the City's General Plan, development consistent with the prezone and applicable City Ordinances may occur. Full buildout of the South Santa Clarita Annexation Area has already been subject to environmental review.<sup>21</sup> The General Plan and Circulation Element Amendment EIRs provide an analysis of buildout consistent with the City's General Plan. These EIRs thus function as program EIRs, as defined in Section 15168 of the CEQA Guidelines, or first tier EIRs, for purposes of evaluating the impact of future actions consistent with the General Plan, including the South Santa Clarita Annexation and Prezone.

<sup>20</sup> Akin to PRC Section 21083.3(d).

<sup>21</sup> This analysis represents a worst case analysis, as the General Plan EIR and Circulation Element Amendment EIRs did not take account of the density reducing effects of City ordinances, such as the Ridgeline Preservation and Hillside Development Ordinance.

## **Tier 2 - This Negative Declaration**

This Negative Declaration is tiered from the General Plan and Circulation Element Amendment EIRs (General Plan EIRs), and constitutes the second tier of analysis. As provided by Section 15152 of the CEQA Guidelines, this Negative Declaration focuses on the question of whether the annexation and prezone would result in significant effects on the environment, that were not examined as significant effects, in the prior EIRs. As detailed in Section E of this Negative Declaration, the Discussion of Environmental Impacts, no impacts, beyond those previously addressed the General Plan EIRs are anticipated to result from the South Santa Clarita Annexation and Prezone.

In the absence of a specific development proposal, evaluation of any parcel or project-specific impacts would be highly speculative and of little value at this time. For this reason, this Negative Declaration evaluates the potential for the annexation and prezone to result in impacts that were not addressed as part of the General Plan EIRs.

## **Tier 3 - Any Future Development Consistent with the Proposed Rezoning Would be Subject to CEQA**

Any future development proposal within the Annexation Area would be subject to CEQA. Analysis of any such proposal would be conducted at a site-specific level of detail. This development-plan specific analysis would constitute Tier 3-level analysis.

## **References**

- (a) City of Santa Clarita General Plan.
- (b) Final Environmental Impact Report For The Santa Clarita General Plan, June 1991. State Clearinghouse Number: 90010683.
- (c) City of Santa Clarita Circulation Element Final Environmental Impact Report, September 1997. State Clearinghouse Number: 96112028.

## **B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or a "Potentially Significant Impact Unless Mitigation Measures Incorporated" as indicated by the checklist on the following pages.

|                                                        |                                                    |                                               |
|--------------------------------------------------------|----------------------------------------------------|-----------------------------------------------|
| <input type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture Resources     | <input type="checkbox"/> Air Quality          |
| <input type="checkbox"/> Biological Resources          | <input type="checkbox"/> Cultural Resources        | <input type="checkbox"/> Geology /Soils       |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use / Planning  |
| <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Noise                     | <input type="checkbox"/> Population / Housing |

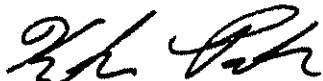
- ☐ Public Services                      ☐ Recreation                      ☐ Transportation/Traffic  
☐ Utilities / Service Systems   ☐ Mandatory Findings of Significance

**C. DETERMINATION:**

On the basis of this initial evaluation:

- ☒ I find that the proposed annexation is not subject to CEQA.
- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Prepared by:



Kelvin Parker  
Associate Planner

Date: 02-03-2003

Signature/ Title  
Approved by:



Vincent P. Bertoni  
Planning Manager

Date: 02-03-2003

Signature/Title

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**D. EVALUATION OF ENVIRONMENTAL IMPACTS:**

|                                                                                                                                                                                        | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Impact                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| <b>I. AESTHETICS -- Would the project:</b>                                                                                                                                             |                                      |                                                |                                    |                                     |
| a) Have a substantial adverse effect on a scenic vista?                                                                                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, primary/secondary ridgelines, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings?                                                                                    | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Other _____                                                                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**II. AGRICULTURE RESOURCES:** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

|                                                                                                                                                                                                                                                |                          |                          |                          |                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?                                                                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?                                                                                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Other _____                                                                                                                                                                                                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**III. AIR QUALITY --** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

|                                                                                 |                          |                          |                          |                                     |
|---------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

|                                                                                                                                                                                                                                                                                            | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Impact                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?                                                                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutant concentrations?                                                                                                                                                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people?                                                                                                                                                                                                                    | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Other _____                                                                                                                                                                                                                                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**IV. BIOLOGICAL RESOURCES -- Would the project:**

|                                                                                                                                                                                                                                                                                                                  |                          |                          |                          |                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?                                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                      | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Impact                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Oak trees?                                       | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Other _____                                                                                                                                                                       | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**V. CULTURAL RESOURCES -- Would the project:**

|                                                                                                                   |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Directly or indirectly destroy or impact a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Disturb any human remains, including those interred outside of formal cemeteries?                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Other _____                                                                                                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**VI. GEOLOGY AND SOILS -- Would the project:**

|                                                                                                                                                                                                                                                                                        |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:                                                                                                                                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii) Strong seismic ground shaking?                                                                                                                                                                                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction?                                                                                                                                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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|                                                                                                                                                                                                                                    | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Impact                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| iv) Landslides?                                                                                                                                                                                                                    | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Result in substantial wind or water soil erosion or the loss of topsoil, either on or off site?                                                                                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Change in topography or ground surface relief features?                                                                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Earth movement (cut and/or fill) of 10,000 cubic yards or more?                                                                                                                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| h) Development and/or grading on a slope greater than 10% natural grade?                                                                                                                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| i) The destruction, covering or modification of any unique geologic or physical feature?                                                                                                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| j) Other _____                                                                                                                                                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**VII. HAZARDS AND HAZARDOUS MATERIALS - Would the project:**

|                                                                                                                                                                                                                                                                                              |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?                                                                                                                                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving explosion or the release of hazardous materials into the environment (including, but not limited to oil, pesticides, chemicals, fuels, or radiation)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                                                                                                  | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Impact                        |
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| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?                                                                                                  | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?                                                                                                      | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?                                                                                                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?                                             | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| i) Exposure of people to existing sources of potential health hazards (e.g. electrical transmission lines, gas lines, oil pipelines)?                                                                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| j) Other _____                                                                                                                                                                                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**VIII. HYDROLOGY AND WATER QUALITY - Would the project:**

|                                                                         |                          |                          |                          |                                     |
|-------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

|                                                                                                                                                                                                                                                                                                                                                                                               | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Impact                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?                                                                                                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?                                                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?                                                                                                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Otherwise substantially degrade water quality?                                                                                                                                                                                                                                                                                                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?                                                                                                                                                                                                                          | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?                                                                                                                                                                                                                                                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?                                                                                                                                                                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| j) Inundation by seiche, tsunami, or mudflow?                                                                                                                                                                                                                                                                                                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| k) Changes in the rate of flow, currents, or the course and direction of surface water and/or groundwater?                                                                                                                                                                                                                                                                                    | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| l) Other modification of a wash, channel creek or river?                                                                                                                                                                                                                                                                                                                                      | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| m) Impact Stormwater Management?                                                                                                                                                                                                                                                                                                                                                              | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                                                                                                               | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Impact                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| i) Storm water system discharges from areas for materials storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| ii) Significant environmentally harmful increase in the flow rate or volume of volume of storm water runoff?                                                                                                                                                                  | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| iii) Significant and environmentally harmful increases in erosion of the project site or surrounding areas?                                                                                                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| iv) Storm water discharges that would significantly impair the beneficial uses of receiving waters or areas that provide water quality benefits (e.g. riparian corridors, wetlands, etc.)                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| v) Cause harm to the biological integrity of drainage systems and water bodies?                                                                                                                                                                                               | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| vi) Does the proposed project include provisions for the separation and reuse of materials?                                                                                                                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**IX. LAND USE AND PLANNING - Would the project:**

|                                                                                                                                                                                                                                                                                                             |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Disrupt or physically divide an established community (including a low-income or minority community)?                                                                                                                                                                                                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Conflict with any applicable habitat conservation plan, natural community conservation plan, and/or policies by agencies with jurisdiction over the project?                                                                                                                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Affect a Significant Ecological Area (SEA)?                                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**X. MINERAL AND ENERGY RESOURCES - Would the project:**

|                                                                                                                                                                       | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Impact                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Use nonrenewable resources in a wasteful and inefficient manner?                                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**XI. NOISE - Would the project result in:**

|                                                                                                                                                                                                                                                                     |                          |                          |                          |                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?                                                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?                                                                                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XII. POPULATION AND HOUSING - Would the project:**

|                                                                                                                                                                                                           |                          |                          |                          |                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

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|-------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere (especially affordable housing)? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?                                           | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

### XIII. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

|                        |                          |                          |                          |                                     |
|------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| i) Fire protection?    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii) Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iii) Schools?          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iv) Parks?             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### XIV. RECREATION -

|                                                                                                                                                                                                                |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### XV. TRANSPORTATION/TRAFFIC - Would the project:

|                                                                                                                                                                                                                                                                                        |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

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|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?      | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?               | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Result in inadequate emergency access?                                                                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Result in inadequate parking capacity?                                                                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?                                     | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| h) Hazards or barriers for pedestrians or bicyclists?                                                                                                                | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**XVI. UTILITIES AND SERVICE SYSTEMS - Would the project:**

|                                                                                                                                                                                                                                   |                          |                          |                          |                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?                                                                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?                                                                            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

|                                                                                                                        | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Impact                        |
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| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste?                              | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

#### XVII. MANDATORY FINDINGS OF SIGNIFICANCE

|                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?                                                                                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

#### XVII. DEPARTMENT OF FISH AND GAME 'DE MINIMUS' FINDING

|                                                                                                                                                                                                                                                                                                                                                           |                          |                          |                          |                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Will the project have an adverse effect either individually or cumulatively, on fish and wildlife resources? Wildlife shall be defined for the purpose of this question as "all wild animals, birds, plants, fish, amphibians, and related ecological communities, including the habitat upon which the wildlife depends for its continued viability." | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

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**E. DISCUSSION OF ENVIRONMENTAL IMPACTS AND/OR EARLIER ANALYSIS:**

| Section and Subsections | Evaluation of Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| I. AESTHETICS           | <p>(a) – (e) No Significant Impact</p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the prezone, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect aesthetic impacts are anticipated to result from the annexation and prezone.</p> <p><b><u>No Impacts Beyond Those Addressed In Prior EIRs</u></b> - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."</p> <p>The General Plan EIR identified significant unmitigatable land use impacts with buildout of the General Plan. Those impacts are summarized as follows:</p> <p style="padding-left: 40px;">"The residential, commercial, and industrial growth anticipated under the proposed General Plan will convert many undeveloped portions of the planning area to some form of development. Previous commitments between developers and the County of Los Angeles have reduced the city's power to contain development within certain areas of the city. The policies of the Land Use Element (listed in Section C-10) will reduce potential conflicts between incompatible uses, but they cannot eliminate</p> |

building in some sensitive area, such as open space and wildlife habitat areas."

Additional information on these impacts can be found in the General Plan EIR. The City considered these impacts and issued a Statement of Overriding Considerations for these impacts as part of the City's approval of the General Plan.

The General Plan EIR identified significant mitigatable light and glare/shade and shadow and aesthetic impacts with buildout of the General Plan. Additional information on these impacts, and the mitigations provided in the General Plan EIR for these impacts, can be found in the General Plan EIR. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.

The impact of any future trip generation or local roadway construction within the South Santa Clarita Annexation Area has been addressed as part of the Circulation Element Amendment EIR. That EIR identified significant unmitigatable aesthetic impacts due to alteration of important ridgelines, changes in community character, viewshed alteration, and community wide change in nighttime lighting conditions resulting from the City's Circulation Element. Additional information on these impacts, and mitigation measures included in the Circulation Element EIR to reduce these impacts can be found in the Circulation Element Amendment. The City considered these impacts and issued a Statement of Overriding Considerations for these impacts as part of the City's approval of the Circulation Element Amendment. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.

Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.

**No Reasonably Foreseeable Site-Specific Impacts** - The South Santa Clarita Annexation Area does contain significant aesthetic resources, including a primary ridgeline. However, given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts

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|                                         | <p>from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>Mitigating Ordinances</u></b> - The following previously adopted uniformly applied City development standards would apply to the South Santa Clarita Annexation Area upon annexation. These development policies or standards, as articulated in the following ordinances will substantially mitigate aesthetic environmental effects associated with ridgelines and oak trees, when applied to future projects:</p> <ul style="list-style-type: none"> <li>▪ Ridgeline Preservation and Hillside Development Ordinance.</li> <li>▪ Oak Tree Preservation Ordinance</li> </ul> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental aesthetic effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p> |
| <p><b>II. AGRICULTURE RESOURCES</b></p> | <p><b>(a) - (d) No Significant Impact</b></p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the prezone, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect agricultural impacts are</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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|                         | <p>anticipated to result from the annexation and prezone.</p> <p><b><u>No Reasonably Foreseeable Site-Specific Impacts</u></b> - There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located within the Annexation Area, nor is there any land subject to a Williamson Act contract. Although land within the annexation is currently zoned agricultural, little to no agricultural production is occurring within the Annexation Area. A limited portion of the area is used for grazing land. The change in zoning from agricultural to residential uses is thus not anticipated to result in any significant agricultural resource impacts.</p> <p>Given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental agricultural resource effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p> |
| <b>III. AIR QUALITY</b> | <p><b>(a) - (f) No Significant Impact</b></p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the prezonning,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect air quality impacts are anticipated to result from the annexation and prezone.

**No Impacts Beyond Those Addressed In Prior EIRs - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."**

The General Plan EIR identified significant unmitigatable air quality impacts with buildout of the General Plan. Those impacts are summarized as follows:

"The Santa Clarita planning area is located in the South Coast Air Basin, a region which does not meet state and federal air quality standards for ozone and other criteria pollutants. The growth anticipated in the General Plan will contribute more air pollutants to the basin, causing significant impacts to air quality. Several measures contained in the Air Quality Element (noted in Section C-2) will reduce the emissions normally expected from building and other activities, but these emissions cannot be mitigated entirely. Air pollutants from the Santa Clarita planning area will incrementally contribute to the existing non-attainment conditions in the South Coast Air Basin."

Additional information on these impacts can be found in the General Plan EIR. The City considered these impacts and issued a Statement of Overriding Considerations for these impacts as part of the City's approval of the General Plan.

The impact of any future trip generation or local roadway construction within the South Santa Clarita Annexation Area has been addressed as part of the Circulation Element Amendment EIR. That EIR identified significant unmitigatable air quality impacts from pollution emissions during construction resulting from the City's Circulation Element. Additional information on these impacts, and mitigation measures included in the Circulation Element EIR to reduce these impacts can be found in

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|                                        | <p>the Circulation Element Amendment. The City considered these impacts and issued a Statement of Overriding Considerations for these impacts as part of the City's approval of the Circulation Element Amendment. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.</p> <p>Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.</p> <p><b><u>No Reasonably Foreseeable Site-Specific Impacts</u></b> - Given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental air quality effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p> |
| <p><b>IV. BIOLOGICAL RESOURCES</b></p> | <p><b>(a) - (g) No Significant Impact</b></p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|  | <p>occur within the Annexation Area, consistent with the prezoning, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect biological resource impacts are anticipated to result from the annexation and prezone.</p> <p><b><u>No Impacts Beyond Those Addressed In Prior EIRs</u></b> - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."</p> <p>The General Plan EIR identified significant unmitigatable land use impacts with buildout of the General Plan. Those impacts are summarized as follows:</p> <p style="padding-left: 40px;">"The residential, commercial, and industrial growth anticipated under the proposed General Plan will convert many undeveloped portions of the planning area to some form of development. Previous commitments between developers and the County of Los Angeles have reduced the city's power to contain development within certain areas of the city. The policies of the Land Use Element (listed in Section C-10) will reduce potential conflicts between incompatible uses, but they cannot eliminate building in some sensitive area, such as open space and wildlife habitat areas."</p> <p>Additional information on these impacts can be found in the General Plan EIR. The City considered these impacts and issued a Statement of Overriding Considerations for these impacts as part of the City's approval of the General Plan.</p> <p>The General Plan EIR identified significant mitigatable plant life and animal life impacts with buildout of the General Plan. Additional information on these impacts, and the mitigations provided in the General Plan EIR for these impacts, can be found in the General Plan EIR. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.</p> <p>The impact of any future trip generation or local roadway</p> |
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|                              | <p>construction within the South Santa Clarita Annexation Area has been addressed as part of the Circulation Element Amendment EIR. That EIR identified significant unmitigatable degradation of riparian habitat and intrusion into ecological area resulting from the City's Circulation Element. Additional information on these impacts, and mitigation measures included in the Circulation Element EIR to reduce these impacts can be found in the Circulation Element Amendment. The City considered these impacts and issued a Statement of Overriding Considerations for these impacts as part of the City's approval of the Circulation Element Amendment. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.</p> <p>Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.</p> <p><b><u>No Reasonably Foreseeable Site-Specific Impacts</u></b> - The South Santa Clarita Annexation Area is known to contain biological resources. However, given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental biological resource effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p> |
| <b>V. CULTURAL RESOURCES</b> | <b>(a) - (e) No Significant Impact</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |



**No Physical Change In the Environment** - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the prezoning, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect cultural resource impacts are anticipated to result from the annexation and prezone.

**No Impacts Beyond Those Addressed In Prior EIRs** - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."

The General Plan EIR identified significant mitigatable cultural resource impacts with buildout of the General Plan. Additional information on these impacts, and the mitigations provided in the General Plan EIR for these impacts, can be found in the General Plan EIR. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.

The impact of any future trip generation or local roadway construction within the South Santa Clarita Annexation Area has been addressed as part of the Circulation Element Amendment EIR. That EIR identified significant mitigatable cultural resource impacts, in the form of potential disturbance of identified and unidentified cultural resources resulting from the City's Circulation Element. Additional information on these impacts, and mitigation measures included in the Circulation Element EIR to reduce these impacts can be found in the Circulation Element Amendment. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.

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|                              | <p>Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.</p> <p><b><u>No Reasonably Foreseeable Site-Specific Impacts</u></b> - The South Santa Clarita Annexation Area is known to contain at least one cultural resource, the historic railway tunnel. However, given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental cultural resource effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p> |
| <b>VI. GEOLOGY AND SOILS</b> | <p><b>(a) - (j) No Significant Impact</b></p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the pre zoning, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect geological or soils impacts are anticipated to result from the annexation and prezone.

**No Impacts Beyond Those Addressed In Prior EIRs** - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."

The General Plan EIR identified significant mitigatable earth and soils impacts with buildout of the General Plan. Additional information on these impacts, and the mitigations provided in the General Plan EIR for these impacts, can be found in the General Plan EIR. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.

The impact of any future trip generation or local roadway construction within the South Santa Clarita Annexation Area has been addressed as part of the Circulation Element Amendment EIR. That EIR identified significant unmitigatable impacts associated with roads crossing active fault lines, resulting from the City's Circulation Element. Additional information on these impacts, and mitigation measures included in the Circulation Element EIR to reduce these impacts can be found in the Circulation Element Amendment. The City considered these impacts and issued a Statement of Overriding Considerations for these impacts as part of the City's approval of the Circulation Element Amendment. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.

Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.

**No Reasonably Foreseeable Site-Specific Impacts** - The South Santa Clarita Annexation Area is known to contain faulting and other geological hazards such as slopes of greater than 10 %. However, given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts

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|                                             | <p>and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>Mitigating Ordinances</u></b> - The following previously adopted uniformly applied City development standards would apply to the South Santa Clarita Annexation Area upon annexation. These development policies or standards, as articulated in the following ordinance will substantially mitigate changes in topography or ground surface relief features or impacts associated from any future development proposed to occur on slopes greater than 10 % of nature grade when applied to future projects:</p> <ul style="list-style-type: none"> <li>• Ridgeline Preservation and Hillside Development Ordinance</li> </ul> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental aesthetic effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p> |
| <b>VII. HAZARDS AND HAZARDOUS MATERIALS</b> | <p>(a) - (j) No Significant Impact</p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the prezone, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect hazards or hazardous materials impacts are anticipated to result from the annexation and prezone.

**No Impacts Beyond Those Addressed In Prior EIRs** - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."

The General Plan EIR identified significant mitigatable risk of upset and human health impacts with buildout of the General Plan. Additional information on these impacts, and the mitigations provided in the General Plan EIR for these impacts, can be found in the General Plan EIR. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.

The impact of any future trip generation or local roadway construction within the South Santa Clarita Annexation Area has been addressed as part of the Circulation Element Amendment EIR. That EIR identified significant mitigatable hazards impacts, in the form of roadway corridors in areas of soil and/or groundwater contamination and roadway corridors in active or abandoned oil fields, resulting from the City's Circulation Element. Additional information on these impacts, and mitigation measures included in the Circulation Element EIR to reduce these impacts can be found in the Circulation Element Amendment. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.

Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.

**No Reasonably Foreseeable Site-Specific Impacts** - Given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify

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|                                   | <p>any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental hazardous materials effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| VIII. HYDROLOGY AND WATER QUALITY | <p>(a) - (i) No Significant Impact</p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the pre zoning, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect hydrology or water quality impacts are anticipated to result from the annexation and prezone.</p> <p><b><u>No Impacts Beyond Those Addressed In Prior EIRs</u></b> - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element</p> |

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|  | <p>Amendment."</p> <p>The General Plan EIR identified significant mitigatable water quality, supply and drainage impacts with buildout of the General Plan. Additional information on these impacts, and the mitigations provided in the General Plan EIR for these impacts, can be found in the General Plan EIR. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.</p> <p>The impact of any future trip generation or local roadway construction within the South Santa Clarita Annexation Area has been addressed as part of the Circulation Element Amendment EIR. That EIR identified significant mitigatable hydrology/flooding impacts in the form of decreased surface water quality during construction, water quality impacts from road runoff, and roadways in flood zones, resulting from the City's Circulation Element. Additional information on these impacts, and mitigation measures included in the Circulation Element EIR to reduce these impacts can be found in the Circulation Element Amendment. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.</p> <p>Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.</p> <p><b><u>No Reasonably Foreseeable Site-Specific Impacts</u></b> - Given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>Mitigating Ordinances</u></b> - The following previously adopted uniformly applied City development standards would apply to the South Santa Clarita Annexation Area upon annexation. These development policies or standards, as articulated in the following</p> |
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|                                  | <p>ordinances will substantially mitigate stormwater, water quality and floodplain related environmental effects when applied to future projects:</p> <ul style="list-style-type: none"> <li>▪ Standard Urban Stormwater Mitigation Plan Implementation Ordinance</li> <li>▪ Stormwater and Urban Runoff Pollution Control Ordinance</li> <li>▪ Floodplain Management Ordinance</li> </ul> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental hydrology or water quality effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>IX. LAND USE AND PLANNING</b> | <p><b>(a) - (d) No Significant Impact</b></p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly, no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the pre zoning, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect land use and planning impacts are anticipated to result from the annexation and prezone.</p> <p><b><u>No Impacts Beyond Those Addressed In Prior EIRs</u></b> - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element</p> |



Amendment."

The General Plan EIR identified significant unmitigatable land use impacts with buildout of the General Plan. Those impacts are summarized as follows:

"The residential, commercial, and industrial growth anticipated under the proposed General Plan will convert many undeveloped portions of the planning area to some form of development. Previous commitments between developers and the County of Los Angeles have reduced the city's power to contain development within certain areas of the city. The policies of the Land Use Element (listed in Section C-10) will reduce potential conflicts between incompatible uses, but they cannot eliminate building in some sensitive area, such as open space and wildlife habitat areas."

Additional information on these impacts can be found in the General Plan EIR. The City considered these impacts and issued a Statement of Overriding Considerations for these impacts as part of the City's approval of the General Plan.

Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.

**No Reasonably Foreseeable Site-Specific Impacts** - Given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.

**No Cumulative Impact** - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior

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|                                               | <p>environmental review, it is not anticipated that the annexation will result in any new incremental land use effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p><b>X. MINERAL AND ENERGY RESOURCES</b></p> | <p><b>(a) - (d) No Significant Impact</b></p> <p><u><b>No Physical Change In the Environment</b></u> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the pre zoning, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect mineral and energy resources impacts are anticipated to result from the annexation and prezone.</p> <p><u><b>No Impacts Beyond Those Addressed In Prior EIRs</b></u> - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."</p> <p>The General Plan EIR identified significant mitigatable natural resource impacts with buildout of the General Plan. Additional information on these impacts, and the mitigations provided in the General Plan EIR for these impacts, can be found in the General Plan EIR. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.</p> <p>Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.</p> |

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|                  | <p><b><u>No Reasonably Foreseeable Site-Specific Impacts</u></b> - Given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental mineral or energy resources effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p> |
| <b>XI. NOISE</b> | <p><b>(a) - (f) No Significant Impact</b></p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the rezoning, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect noise impacts are anticipated to result from the annexation and prezone.</p> <p><b><u>No Impacts Beyond Those Addressed In Prior EIRs</u></b> - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of</p>                                                                       |

buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."

The General Plan EIR identified significant mitigatable noise impacts with buildout of the General Plan. Additional information on these impacts, and the mitigations provided in the General Plan EIR for these impacts, can be found in the General Plan EIR. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.

The impact of any future trip generation or local roadway construction within the South Santa Clarita Annexation Area has been addressed as part of the Circulation Element Amendment EIR. That EIR identified significant unmitigatable noise impacts during construction resulting from the City's Circulation Element. Additional information on these impacts, and mitigation measures included in the Circulation Element EIR to reduce these impacts can be found in the Circulation Element Amendment. The City considered these impacts and issued a Statement of Overriding Considerations for these impacts as part of the City's approval of the Circulation Element Amendment.

The Circulation Element Amendment EIR also identified significant mitigatable noise impacts, in the form of traffic noise on new roadways, resulting from the City's Circulation Element. Additional information on these impacts, and mitigation measures included in the Circulation Element EIR to reduce these impacts can be found in the Circulation Element Amendment. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.

Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.

**No Reasonably Foreseeable Site-Specific Impacts** - Given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts

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|                                    | <p>from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental noise effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>XII. POPULATION AND HOUSING</b> | <p><b>(a) - (c) No Significant Impact</b></p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the prezone, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect population and housing impacts are anticipated to result from the annexation and prezone.</p> <p><b><u>No Impacts Beyond Those Addressed In Prior EIRs</u></b> - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."</p> <p>The General Plan EIR identified significant mitigable</p> |

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|                                     | <p>population and housing impacts with buildout of the General Plan. Additional information on these impacts, and the mitigations provided in the General Plan EIR for these impacts, can be found in the General Plan EIR. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.</p> <p>Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.</p> <p><b><u>No Reasonably Foreseeable Site-Specific Impacts</u></b> - Given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental population or housing effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p> |
| <p><b>XIII. PUBLIC SERVICES</b></p> | <p><b>(a) No Significant Impact</b></p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

Although development of additional housing may eventually occur within the Annexation Area, consistent with the prezone, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect public service impacts are anticipated to result from the annexation and prezone.

**No Impacts Beyond Those Addressed In Prior EIRs** - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."

The General Plan EIR identified significant unmitigatable public service impacts with buildout of the General Plan. Those impacts are summarized as follows:

"A few of the local public service do not adequately serve the existing population. For example, each of the local school districts is over capacity, several roadways are impacted, and parks are limited. New development authorized under the proposed General Plan will further impact these areas. Full implementation of the policies contained in the General Plan (listed in Section C-14) will mitigate the impacts to some degree, but there will be a time lag between anticipated growth and the completion of facilities to mitigated adverse impacts."

Additional information on these impacts can be found in the General Plan EIR. The City considered these impacts and issued a Statement of Overriding Considerations for these impacts as part of the City's approval of the General Plan. Since adoption of the General Plan, the City has made progress in implementing mitigation measures identified in the General Plan, resulting for instance in an increase in parkland within the City.

The impact of any future trip generation or local roadway construction within the South Santa Clarita Annexation Area has been addressed as part of the Circulation Element Amendment EIR. That EIR identified significant mitigatable public services, utilities and energy impacts, in the form of potential disturbances of water pipelines and truck sewers, resulting from the City's

Circulation Element. Additional information on these impacts, and mitigation measures included in the Circulation Element EIR to reduce these impacts can be found in the Circulation Element Amendment. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.

Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.

**No Reasonably Foreseeable Site-Specific Impacts** -

Approval of the South Santa Clarita Annexation would not result in any alteration in public service provision to existing residents within the Annexation Area. The Los Angeles County sheriff will continue to provide policing services to the area. The Los Angeles County Fire Department will continue to provide fire services to the area. Children living the area would continue to attend the Newhaul School District (Newhaul Elementary) and the William S. Hart Union School District (Placerita Jr. High and Hart High School). Annexation will not result in any impact to existing uses within the Annexation Area.

Given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.

**No Cumulative Impact** - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental public service effects that would be considerable, when viewed in the context of past, present, and probably future projects.



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| <b>XIV. RECREATION</b> | <p><b>(a) - (b) No Significant Impact</b></p> <p><u><b>No Physical Change In the Environment</b></u> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the prezoning, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect recreation impacts are anticipated to result from the annexation and prezone.</p> <p><u><b>No Impacts Beyond Those Addressed In Prior EIRs</b></u> - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."</p> <p>The General Plan EIR identified significant mitigatable recreation impacts with buildout of the General Plan. Additional information on these impacts, and the mitigations provided in the General Plan EIR for these impacts, can be found in the General Plan EIR. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.</p> <p>Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.</p> <p><u><b>No Reasonably Foreseeable Site-Specific Impacts</b></u> - Given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan</p> |
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|                                                    | <p>revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental recreation effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p><b>XV.<br/>TRANSPORTATION /<br/>TRAFFIC</b></p> | <p><b>(a) - (h) No Significant Impact</b></p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the prezone, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect transportation and traffic impacts are anticipated to result from the annexation and prezone.</p> <p><b><u>No Impacts Beyond Those Addressed In Prior EIRs</u></b> - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."</p> |

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|  | <p>The General Plan EIR identified significant unmitigatable traffic impacts with buildout of the General Plan. Those impacts are summarized as follows:</p> <p>"The City of Santa Clarita is a receptor of regional traffic in addition to traffic generated within the city. The additional growth allowed under the General Plan will significantly increase the number of cars on Santa Clarita roads. Roadway improvements recommended in the plan require funding, the acquisition of right-of-way, and lengthy construction periods. Additional mitigation measures to reduce transportation impacts include the use of Transportation Demand Management strategies, such as vanpools, carpools, public transportation, modified employment hours, and telecommuting, to make better use of the existing roadway capacity. Additional mitigations will be provided in the circulation plan's implementation program. Although the roadway improvements recommended in the plan will provide overall acceptable levels of service, there will be a delay between the time the improvements are needed and can be provided."</p> <p>Additional information on these impacts can be found in the General Plan EIR. The City considered these impacts and issued a Statement of Overriding Considerations for these impacts as part of the City's approval of the General Plan.</p> <p>Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.</p> <p><b><u>No Reasonably Foreseeable Site-Specific Impacts</u></b> - Given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations</p> |
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|                                                  | <p>included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental transportation or circulation effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p><b>XVI. UTILITIES AND SERVICE SYSTEMS</b></p> | <p><b>(a) - (g) No Significant Impact</b></p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the pre zoning, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect utilities and service system impacts are anticipated to result from the annexation and prezone.</p> <p><b><u>No Impacts Beyond Those Addressed In Prior EIRs</u></b> - The South Santa Clarita Annexation prezone is consistent with the land use designations in the City's General Plan. The impact of buildout of the City's General Plan has received prior environmental review in the "Final Environmental Impact Report for the City of Santa Clarita General Plan" "Final Environmental Impact Report for the City of Santa Clarita Circulation Element Amendment."</p> <p>The General Plan EIR identified significant unmitigatable public service impacts with buildout of the General Plan. Those impacts are summarized as follows:</p> <p style="padding-left: 40px;">"A few of the local public service do not adequately serve the existing population. For example, each of the local school districts is over capacity, several roadways are impacted, and parks are limited. New development authorized under the proposed General Plan will further</p> |

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|  | <p>impact these areas. Full implementation of the policies contained in the General Plan (listed in Section C-14) will mitigate the impacts to some degree, but there will be a time lag between anticipated growth and the completion of facilities to mitigated adverse impacts."</p> <p>Additional information on these impacts can be found in the General Plan EIR. The City considered these impacts and issued a Statement of Overriding Considerations for these impacts as part of the City's approval of the General Plan. Since adoption of the General Plan, the City has made progress in implementing mitigation measures identified in the General Plan, resulting for instance in an increase in parkland within the City.</p> <p>The General Plan EIR identified significant mitigatable energy and utilities impacts with buildout of the General Plan. Additional information on these impacts, and the mitigations provided in the General Plan EIR for these impacts, can be found in the General Plan EIR. With approval of the South Santa Clarita Annexation Area, the area would become subject to all of the City of Santa Clarita's standard mitigation requirements.</p> <p>Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment, and the fact that the annexation and prezone are consistent with the City's General Plan, no significant effects, beyond those examined in the prior EIRs, are anticipated to result from the annexation.</p> <p><b><u>No Reasonably Foreseeable Site-Specific Impacts</u></b> - Approval of the South Santa Clarita annexation would not result in any alteration in utility service provision in the Annexation Area. CLWA will continue as the water wholesaler for the area and Newhaul County Water District will continue to be the water purveyor. Annexation will not result in any impact to existing uses within the Annexation Area.</p> <p>Given the fact that the annexation and prezone are not associated with any site-specific development proposal, it is not possible to identify any site-specific impacts and thus not possible to identify any site-specific mitigations or site-specific development plan revisions that would result in additional reductions in impacts from buildout of the City's General Plan at this time. Any future development proposals within the South Santa Clarita Annexation Area will be subject to CEQA environmental review requirements, thus allowing for development of site-specific mitigations or site-specific development plan revisions during the next tier of the environmental review process.</p> |
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|                                                 | <p><b><u>Mitigating Ordinances</u></b> - The following previously adopted uniformly applied City development standards would apply to the South Santa Clarita Annexation Area upon annexation. These development policies or standards, as articulated in the following ordinance will substantially mitigate ____ environmental effects when applied to future projects:</p> <ul style="list-style-type: none"> <li>• Integrated Waste Management Ordinance</li> </ul> <p><b><u>No Cumulative Impact</u></b> - The South Santa Clarita Annexation Area prezone is consistent with the land use designations included in the City's General Plan. Given that the South Santa Clarita Annexation will not result in any direct or indirect physical change in the environment and the fact that land use consistent with the City's General Plan has received prior environmental review, it is not anticipated that the annexation will result in any new incremental utilities or service system effects that would be considerable, when viewed in the context of past, present, and probably future projects.</p>                                                                                                                                                    |
| <b>XVII. MANDATORY FINDINGS OF SIGNIFICANCE</b> | <p><b>(a) - (c) No Significant Impact</b></p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no development proposal associated with the South Santa Clarita Annexation and prezone, no direct physical change in the environment will result from the proposed annexation. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the annexation. Although development of additional housing may eventually occur within the Annexation Area, consistent with the pre zoning, the specific location and number of such housing units is speculative at this time, and is unlikely to occur in the reasonably foreseeable future. Without information about specific location and number of units, no analysis of effects upon the environment that are "peculiar to the parcel" is possible. Thus, no direct or reasonably foreseeable indirect impacts are anticipated to result from the annexation and prezone. No mandatory findings of significance are triggered by the South Santa Clarita Annexation, as detailed in I - XVI, above.</p> |

S:\pbs\annex/ssca/environmental/initial study 2

**ATTACHMENT:  
NOTICE OF PREPARATION,  
CITY OF LOS ANGELES,  
LAS LOMAS ANNEXATION PROJECT**

DEPARTMENT OF  
CITY PLANNING  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801

**CITY PLANNING COMMISSION**

—  
**MITCHELL B. MENZER**  
PRESIDENT  
**JOSEPH KLEIN**  
VICE-PRESIDENT  
**RICHARD BROWN**  
**MABEL CHANG**  
**DORENE DOMINGUEZ**  
**JAVIER O. LOPEZ**  
**PASTOR GERARD MCCALLUM II**  
**ROBERT L. SCOTT**  
**PETER M. WEIL**  
—  
**GABRIELE WILLIAMS**  
COMMISSION EXECUTIVE ASSISTANT  
(213) 978-1247

**CITY OF LOS ANGELES**  
CALIFORNIA



**JAMES K. HAHN**  
MAYOR

**RECEIVED**

**JUN 28 2002**

PLANNING AND BUILDING SERVICES  
CITY OF SANTA CLARITA

**EXECUTIVE OFFICES**  
5TH FLOOR

**CON HOWE**  
DIRECTOR  
(213) 978-1271  
**FRANKLIN P. EBERHARD**  
DEPUTY DIRECTOR  
(213) 978-1273  
**GORDON B. HAMILTON**  
DEPUTY DIRECTOR  
(213) 978-1272  
**ROBERT H. SUTTON**  
DEPUTY DIRECTOR  
(213) 978-1274  
FAX: (213) 978-1275  
INFORMATION  
(213) 978-1270

June 27, 2002

**PRE-DRAFT ENVIRONMENTAL IMPACT REPORT REQUEST FOR COMMENTS AND  
NOTICE OF PUBLIC SCOPING MEETING**

**EIR NO.:** ENV-2002-3013-EIR

**PROJECT NAME:** Las Lomas Annexation Project

**PROJECT DESCRIPTION:** A proposed annexation of an approximately 555 acre portion of Los Angeles County to the City of Los Angeles in conjunction with the development of a mixed-use community with approximately 5,800 dwelling units of low to very high density, 2,300,000 sf of Office/Research & Development, 250,000 sf of Community Facilities (including a K-8 school), 225,000 sf of Neighborhood Retail, a 300-room hotel, and 285 acres of open space. Proposed recreational amenities include pedestrian and bike trails, parks, a library, theaters, and a museum. The applicant also proposes to connect to the MetroLink commuter rail, and construct a trolley to serve the community. Five single-family dwellings would be demolished, and the existing transmission lines and cellular tower located on the southern portion of the project would be relocated to other portions of the site. The project would include its own wastewater treatment facility, alternative energy generation facilities water tank, and a series of pump stations. The following discretionary actions are being requested: Sphere of Influence, General Plan/Community Plan Amendment, Zone Change, Specific Plan, Vesting Tentative Tract Map, Development Agreement, US Army Corps of Engineers Section 404 permit, US Fish and Wildlife Service Permit, California Department of Fish and Game Permit, Oak Tree Permit, and CA Regional Water Quality Control Board NPDES Permit.

**PROJECT LOCATION/ADDRESS:** 23110 and 23500 The Old Road, County of Los Angeles between Interstate 5 and Highway 14 Exit and Calgrove Boulevard Exit.

**PLANNING AREA:** N/A

**COUNCIL DISTRICT:** N/A

**02 0004263**



DUE DATE: August 12,

PUBLIC SCOPING MEETING DATE AND LOCATION: July 11, 2002 at 6:00 PM, The Odyssey Restaurant, 15600 Odyssey Road, Granada Hills.

AREAS OF POSSIBLE ENVIRONMENTAL IMPACT: Aesthetics, Air Quality, Agricultural Resources, Biological Resources, Cultural Resources, Geology and Soils, Hazards & Hazardous Materials, Hydrology/Water Quality, Land Use and Planning, Noise, Population And Housing, Public Services, Recreation, Transportation/Traffic, and Utilities/Energy Conservation.

The enclosed materials describe a proposed land development project and suggest possible environmental impacts of the project, which lies in an area that has been determined to be of interest to yourself and/or the organization you represent. An Environmental Impact Report (EIR) is to be prepared for this project by this office. We welcome all comments on the possible environmental impacts of the proposed project so that we can take them into consideration in the preparation of the EIR. All comments should be in writing and must be submitted to this office by August 12, 2002.

Please direct your responses to:

Maya Zaitzevsky, Project Coordinator  
200 North Spring Street, Room 763  
Los Angeles, CA 90012 (213) 978-1355

Con Howe  
Director of Planning

*Maya E. Zaitzevsky*

Maya E. Zaitzevsky  
City Planning Associate  
Environmental Review Section

Enclosures

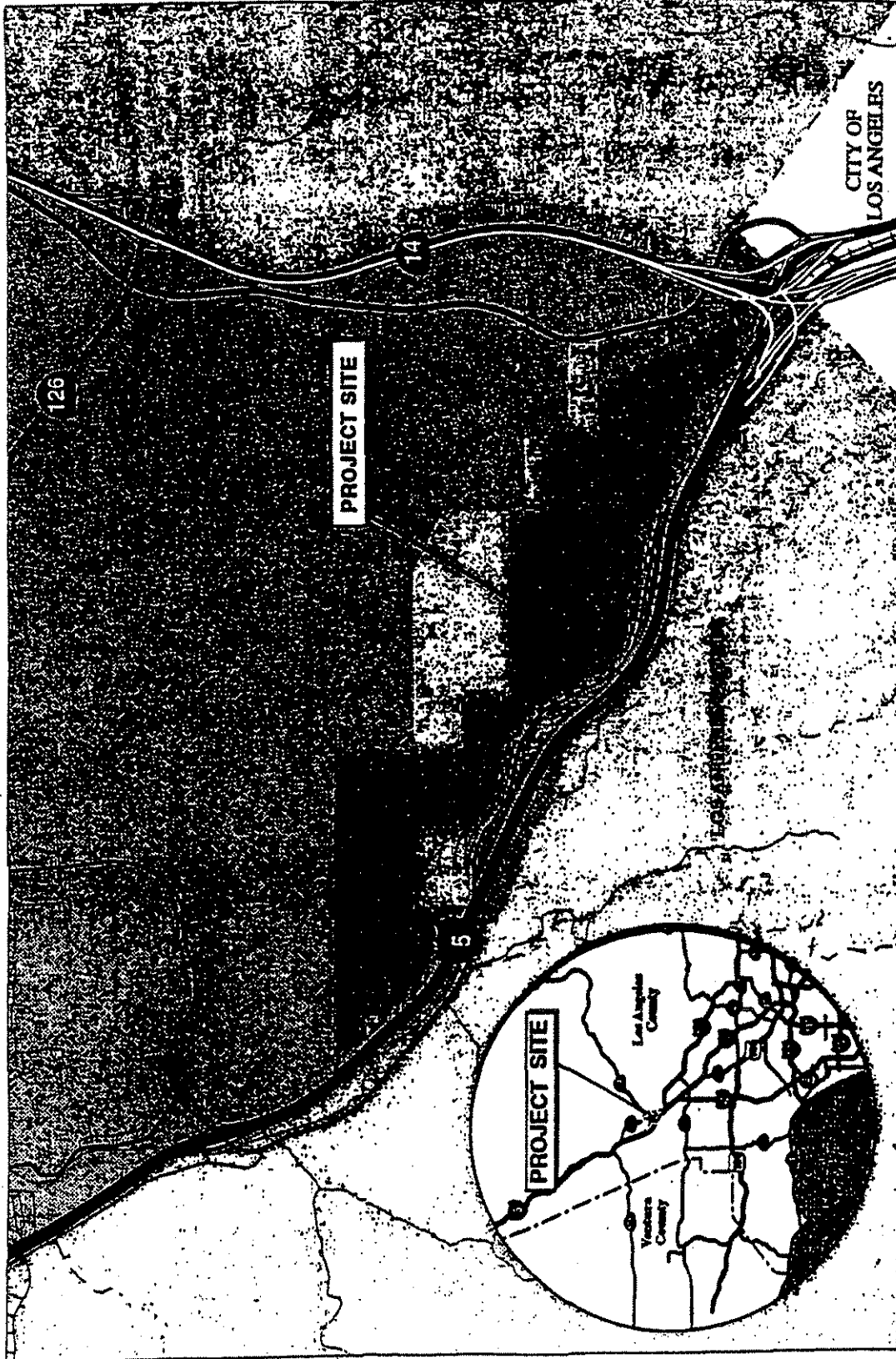
CITY OF LOS ANGELES  
OFFICE OF THE CITY CLERK  
ROOM 395, CITY HALL  
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF PREPARATION

(Article VI, Section 2 - City CEQA Guidelines)

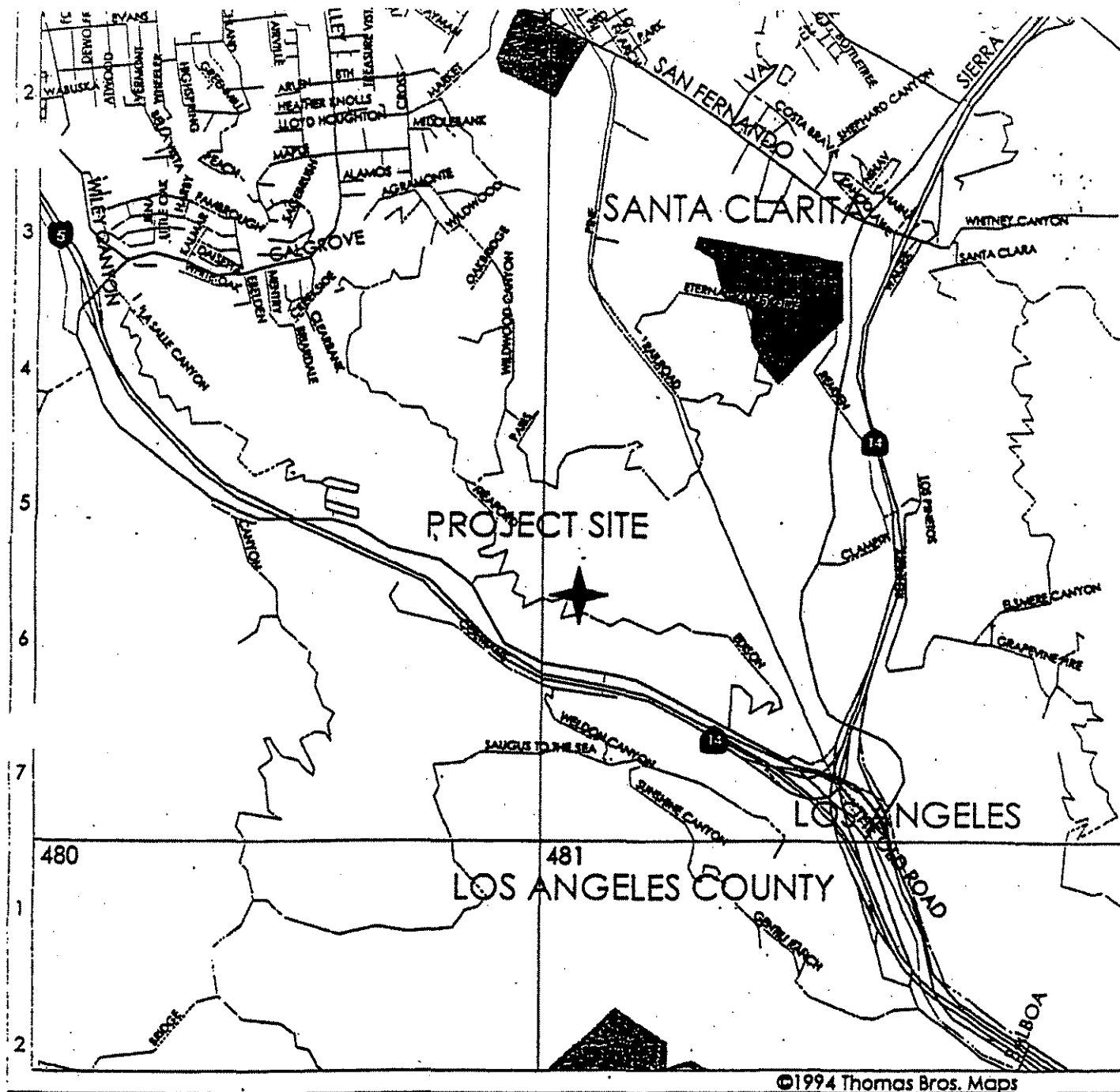
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                       |                               |                                                                                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|----------------------------------------------------------------------------------------|
| TO:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | RESPONSIBLE OR TRUSTEE AGENCY<br>State Clearinghouse                                                                                  | FROM:                         | LEAD CITY AGENCY Los Angeles Department<br>of City Planning                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | ADDRESS (Street, City, Zip)<br>Office of Planning & Research<br>Attn: Glen Stober<br>1400 Tenth St., Room 121<br>Sacramento, CA 95814 |                               | ADDRESS (Street, City, Zip)<br>200 N. Spring Street, Room 763<br>Los Angeles, CA 90012 |
| SUBJECT: Notice Of Preparation of a Draft Environmental Impact Report                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                       |                               |                                                                                        |
| PROJECT TITLE<br>Las Lomas Annexation Project                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                       | CASE NO.<br>ENV-2002-3013-EIR |                                                                                        |
| PROJECT APPLICANT, IF ANY<br>Las Lomas Land Company, LLC                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                       |                               |                                                                                        |
| <p>The City of Los Angeles will be the Lead Agency and will prepare an environmental impact report for the project identified above. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency will need to use the EIR prepared by this City when considering your permit or other approval for the project.</p> <p>The project description, location and the probable environmental effects are contained in the attached materials.</p> <p>[ ] A copy of the Initial Study is attached.</p> <p>[✓] A copy of the Initial Study is not attached.</p> <p>Due to the time limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.</p> <p>Please send your response to <u>Maya Zaitzevsky</u> at the address of the Lead City Agency as shown above. We will need the name of a contact person in your agency.</p> <p>Note: If the Responsible or trustee agency is a state agency, a copy of this form must be sent to the State Clearinghouse in the Office of Planning and Research, 1400 Tenth Street, Sacramento, California 95814. A state identification number will be issued by the Clearinghouse and should be thereafter referenced on all correspondences regarding the project, specifically on the title page of the draft and final EIR and on the Notice of Determination.</p> |                                                                                                                                       |                               |                                                                                        |
| SIGNATURE                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | TITLE                                                                                                                                 | TELEPHONE NUMBER              | DATE                                                                                   |
| Maya E. Zaitzevsky                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | City Planning Associate                                                                                                               | (213) 978-1355                | 6/27/02                                                                                |



SOURCE: Thomas Bros. Maps

23110 and 23500 The Old Road / 201434

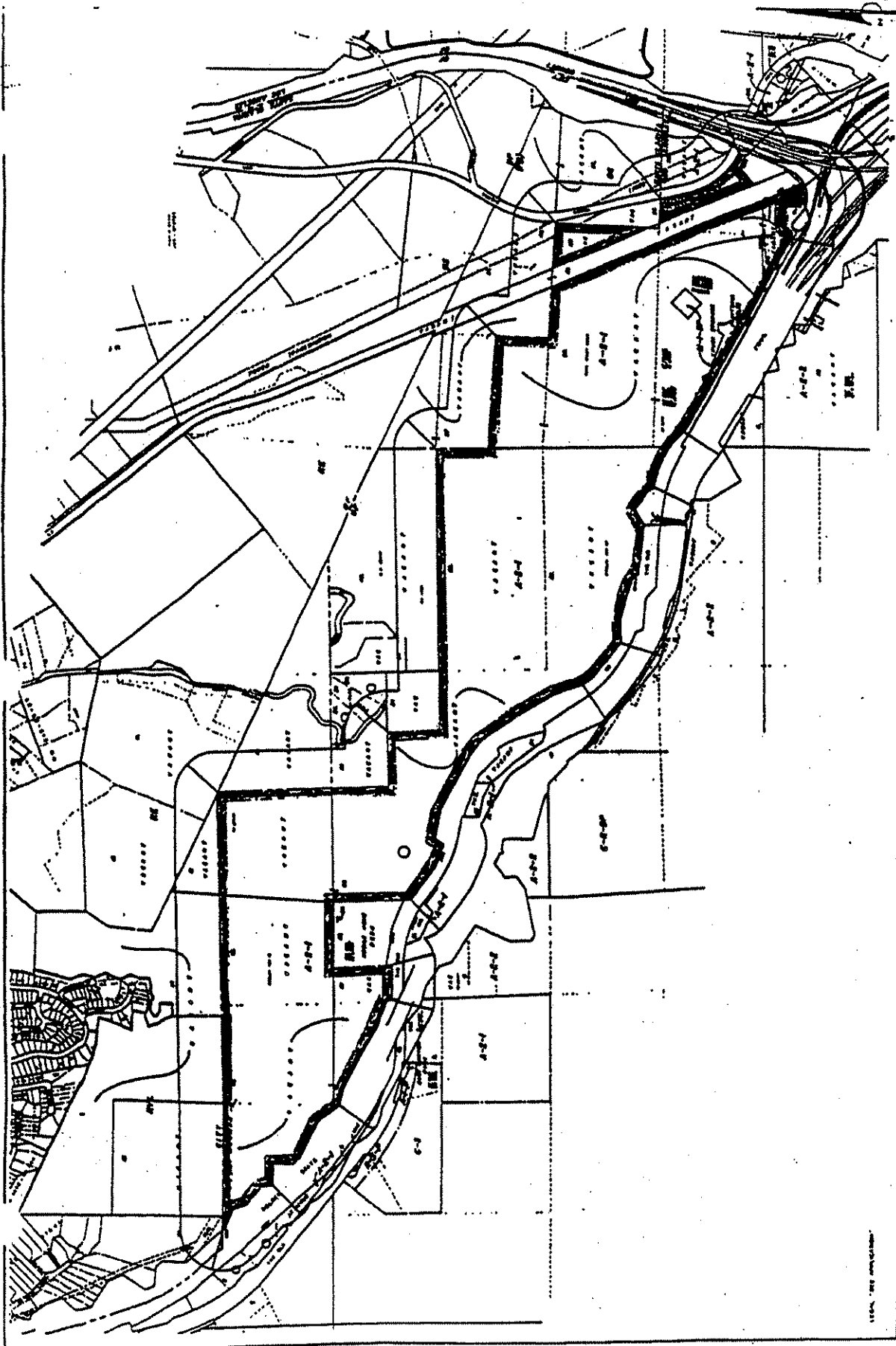
**Exhibit A**  
Vicinity Map



# VICINITY MAP

SITE : LAS LOMAS

GC MAPPING SERVICE  
 711 MISSION ST. SUITE B  
 SOUTH PASADENA CA 91030  
 (626) 441-1080



# ENVIRONMENTAL IMPACT REPORT

GC MAPPING SERVICE  
 11111 1st Street, Suite 100  
 San Diego, CA 92108  
 (619) 594-1111

DATE: 10/1/88  
 BY: J. L. Smith  
 CHECKED: J. L. Smith  
 APPROVED: J. L. Smith  
 SCALE: 1" = 1000'



Allen Matkins Leck Gamble & Mallory LLP  
attorneys at law

Allen Matkins

515 South Figueroa 7th Floor Los Angeles California 90071-3398  
telephone. 213 622 5555 facsimile. 213 620 8818 www.allenmatkins.com

writer. R.J. Comer t. 213 955 5520  
file number. P1240-009/LA607989.04 e. rcomer@allenmatkins.com

February 25, 2003

**VIA FACSIMILE (without enclosures)**  
**AND HAND DELIVERED**

Santa Clarita City Council  
City of Santa Clarita  
23920 Valencia Boulevard  
Santa Clarita, CA 91355

CITY OF SANTA CLARITA  
2003 FEB 25 P 4: 12  
RECEIVED  
CITY CLERKS OFFICE

Re: Master Case Number 02-474 (Prezone No. 02-004) (Annexation No. 02-004),  
City Council Meeting, February 25, 2003, Agenda Item No. 15

Dear Mayor Smyth and Councilmembers:

This firm represents Las Lomas Land Company ("Las Lomas"), developer of the Las Lomas Specific Plan project (the "Las Lomas Project") proposed for annexation into the City of Los Angeles ("Los Angeles"). The Las Lomas Project site is currently located in unincorporated Los Angeles County (the "County"). The City of Santa Clarita ("Santa Clarita") is proposing to prezone and potentially annex the Las Lomas Project site and some neighboring properties in connection with the above-referenced case (the "Santa Clarita Project"). On behalf of Las Lomas, we hereby object to Santa Clarita's efforts to prezone and annex the Las Lomas Project site. Los Angeles and the Las Lomas property owners also object. Las Lomas specifically objects to Santa Clarita's attempt to undertake these actions without proper environmental review pursuant to the requirements of the California Environmental Quality Act ("CEQA"). Pub. Res. Code §§ 21000 *et seq.*; Cal. Code of Reg., Title 14, §§ 15000 *et seq.* ("CEQA Guidelines"). Las Lomas also objects to Santa Clarita's improper assertion of lead agency status under CEQA.

On behalf of Las Lomas, we have reviewed Santa Clarita's proposed negative declaration ("ND") dated as of February 4, 2003, prepared for the Santa Clarita Project and have determined that the ND is legally inadequate. As set forth in more detail below, the ND: (i) fails to identify the whole of the Santa Clarita Project as to the Las Lomas Project site; (ii) fails to identify a number of the Santa Clarita Project's potentially significant environmental impacts; and (iii) fails to adequately address all of the impacts that the ND does identify. Accordingly, the ND fails to comply with the requirements of CEQA.

In addition, substantial evidence exists in the record of the Santa Clarita Project to support a fair argument that the Santa Clarita Project, had it been properly described in the ND, would have significant environmental impacts. CEQA Guidelines § 15064(f)(1). Consequently, an Environmental Impact Report ("EIR") must be prepared. California law provides that an EIR

Santa Clarita City Council  
February 25, 2003  
Page 2

is required whenever there is a "fair argument" that significant impacts may occur. *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75; *Laurel Heights Improvement Association v. Regents* (1993) 6 Cal.4th 1112, 1123. The "fair argument" standard creates a "low threshold" for requiring preparation of an EIR. *No Oil*, 13 Cal.3d at 75. CEQA Guidelines Section 15064(f)(1) makes it clear that even if substantial evidence would support the opposite conclusion, nevertheless an EIR is required where there is a fair argument that a project will cause significant environmental impacts.

Furthermore, under CEQA, Los Angeles is the lead agency over the Las Lomas Project site and is, therefore, the agency with the "principle responsibility for carrying out or approving a project which may have a significant effect upon the environment." CEQA Guidelines § 21067. Los Angeles meets the criteria for lead agency under CEQA, whereas Santa Clarita does not. Santa Clarita cannot bypass CEQA regulations by simply asserting lead agency status over the Las Lomas Project site by including such property as part of its project. Santa Clarita can, however, assert lead agency status for that portion of the Santa Clarita Project that does not include the Las Lomas Project site.

#### I. Background

The Las Lomas Project site consists of 555 acres of undeveloped land located at the intersection of the Interstate 5 Freeway and State Route 14. The Las Lomas Project site is currently zoned R1 by Los Angeles pursuant to Los Angeles Municipal Code section 12.35. Las Lomas has already filed with the Local Agency Formation Commission ("LAFCO") an owner-initiated petition to annex the Las Lomas Project area into Los Angeles. The staff report accompanying the Santa Clarita Project resolutions incorrectly and misleadingly states that the Las Lomas Project petition to annex is "not contiguous with the City of Los Angeles." Only the public right-of-way of Interstate 5 and State Route 14 separates the Las Lomas Project site from the boundary of Los Angeles. As Santa Clarita staff are aware, it is a standard practice at LAFCO to treat such public rights-of-way as nonexistent for purposes of determining whether property boundaries are contiguous with an affected jurisdiction regarding a proposed reorganization.

The Santa Clarita Project is the latest in a long history of failed attempts to annex this area. In November 2000, Los Angeles City Councilmember Hal Bernson made a motion that the Los Angeles Planning Department prepare an application for a revised sphere of influence for Los Angeles, which includes the Las Lomas Project site. Today, as it did at the time of Councilmember Hal Bernson's motion, Los Angeles strongly believes that the Las Lomas Project site, along with another portion of unincorporated territory north of Los Angeles, should be annexed to become a part of Los Angeles. Such annexation will result in the most beneficial use



Santa Clarita City Council  
February 25, 2003  
Page 3

of the land and Los Angeles has communicated such belief to Santa Clarita. Los Angeles has also made its intent to proceed with the annexation process clear to both Santa Clarita and LAFCO. Furthermore, Los Angeles is currently prepared to submit an application to LAFCO to amend its sphere of influence to include a significant portion of property north of the Los Angeles border, including the Las Lomas Project site. This sphere of influence amendment is consistent with the determination made by LAFCO on June 13, 2001, when LAFCO rejected Santa Clarita's attempts to annex the Las Lomas Project site.

In May 2002, Las Lomas filed an Environmental Assessment Form with the Los Angeles Planning Department, which formally initiated the approval process for the Las Lomas Project. Los Angeles then undertook the actions required of a lead agency under CEQA. In June 2002, Los Angeles issued a Notice of Preparation ("NOP") which formally initiated the CEQA process. The NOP was sent to Santa Clarita Planning Department staff. Counsel for Las Lomas met personally with Santa Clarita Planning Department staff to brief them regarding the Las Lomas Project before the NOP was published. Thereafter, in July 2002, a public Scoping Meeting was held. At the Scoping Meeting, both the County and Santa Clarita were present and made comments regarding the scope of environmental review each jurisdiction believed was necessary. Santa Clarita also filed extensive written comments on the NOP requesting that Los Angeles—as lead agency—study various issues of concern to Santa Clarita.

Los Angeles accepted Santa Clarita's comments on the NOP and commenced the preparation of an EIR, taking into account environmental concerns including those of Santa Clarita. The Los Angeles Planning Department staff is currently reviewing the Draft EIR. The Los Angeles Transportation Department is currently reviewing the traffic study for the Las Lomas Project. The Draft EIR currently includes Santa Clarita's prezone and annexation as an alternative.

Following the Scoping Meeting, the Santa Clarita City Council resolved to allocate funds and hire an independent consultant to act on behalf of Santa Clarita to oppose the Las Lomas Project. Then, at about this same time, and in total disregard of its previous acknowledgment of Los Angeles as lead agency for the Project, Santa Clarita submitted to LAFCO its own application to annex the Las Lomas Project site, along with other land, into Santa Clarita. It is disturbing to note that in Santa Clarita's December 11, 2002 application to LAFCO, and despite Santa Clarita's public comment on the proposed Las Lomas Project and knowledge of actions taken to annex the Las Lomas site into Los Angeles, Santa Clarita stated in written comments to LAFCO that: "Denial of this request would result in no change of circumstance or jurisdiction." Such a statement, in light of the facts, appears to be intentionally misleading to LAFCO and the public. LAFCO correctly rejected this annexation application as insufficient.

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Santa Clarita also adopted a resolution appointing itself as lead agency with approval authority for its prezone and annexation project with the intention of re-submitting its annexation to LAFCO. During Santa Clarita's various hearings in connection with its proposed annexation, property owners of the Las Lomas Project site and Los Angeles opposed Santa Clarita's annexation. The Los Angeles Planning Department also filed a letter opposing this action by Santa Clarita.

II. Los Angeles Is Lead Agency For the Las Lomas Project Site

CEQA allows only one lead agency, unless two agencies agree to act as cooperative lead agencies. CEQA Guidelines §§ 15050-15053. CEQA defines "lead agency" as: "... the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment." CEQA Guidelines § 21067. The lead agency is primarily responsible for deciding the proper manner for complying with CEQA with regard to a project. CEQA has the following established criteria for determining which agency is the "lead agency":

... the determination of which agency will be the lead agency shall be governed by the following criteria:

- ... (b) If the project is to be carried out by a nongovernmental person or entity, the lead agency shall be the public agency with the greatest responsibility for supervising or approving the project as a whole.
  - (1) The lead agency will normally be the agency with general governmental powers, such as a city ...
  - (2) Where a city prezones an area, the city will be the appropriate lead agency for any subsequent annexation of the area and should prepare the appropriate environmental document at the time of the pre zoning. The local agency formation commission shall act as a responsible agency.

CEQA Guidelines § 15051.

Los Angeles meets the criteria for lead agency set forth by CEQA and has been acting as lead agency over the Las Lomas Project site since June 2002, and is currently poised to review and release a Draft EIR for public review. Santa Clarita has acknowledged Los Angeles' status as lead agency by commenting on the NOP, and Santa Clarita has never objected to Los Angeles acting as lead agency. There exists no agreement between Los Angeles and Santa Clarita to cooperate as joint lead agencies. Los Angeles has general governmental powers and has

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prezoned the Las Lomas Project site. Los Angeles has also resolved to amend its sphere of influence to include the Las Lomas Project site. Los Angeles has taken its responsibility as lead agency seriously and is studying the possible environmental impacts that may result from development of the Las Lomas Project and how such impacts may be mitigated. Los Angeles is also studying Santa Clarita's prezone and annexation as an alternative in the Draft EIR.

Santa Clarita cannot be lead agency for the Las Lomas Project site because it does not meet the criteria set forth by CEQA and because allowing Santa Clarita to become lead agency for a project on land where another project is already being considered would contravene the purpose and policies of CEQA.

III. Los Angeles Was The First To Act And Therefore Acquired Lead Agency Status

CEQA provides that: "Where more than one public agency equally meet the criteria ... the agency which will act first on the project in question shall be the lead agency." CEQA Guidelines § 150501. In the case of *Citizens Task Force on Sohio v. Board of Harbor Commissioners of the Port of Long Beach* (1979) 23 Cal.3d 812, the Court held that because the Board was the first to act on the subject project, it became lead agency and was therefore required to defend the adequacy of the EIR at issue. Here, Los Angeles was the first to address the potential environmental impacts that may occur as a result of development of the Las Lomas Project site. Santa Clarita, on the other hand, has only recently attempted to rush a prezone ordinance and annexation on the basis of a negative declaration, as if no other project is currently being reviewed or is possible.

IV. The Purpose Of CEQA Is Best Served If Los Angeles Is Lead Agency For The Las Lomas Project Site

The fundamental purpose of CEQA is to ensure that environmental considerations play a significant role in governmental decision-making. In *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247, 263. In *Friends of Mammoth*, the Court stressed the importance of analyzing indirect environmental impacts likely to be caused by a project. According to *Friends of Mammoth*, when interpreting CEQA a Court must do so as to afford the fullest possible protection to the environment within the reasonable scope of statutory language. *Id.* at 343. Along with this fundamental purpose, one basic concept of CEQA is full disclosure, as stated in CEQA: "to inform governmental decision makers and the public about the potential significant environmental effects of proposed activities." CEQA Guidelines § 15002.

In addition, CEQA prohibits segmentation and piece-mealing of projects. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 716. In *Kings County Farm*

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*Bureau*, the court held that: "The requirements of CEQA cannot be avoided by chopping up a proposed project into bite-size pieces, which, individually considered, might be found to have no significant effect on the environment." *Id.* (citing *Ovinda Association v. Board of Supervisors* (1986) 202 Cal.App.3d 296, 309). A project under CEQA means the "...whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change...." CEQA Guidelines § 15378.

Santa Clarita's project interferes with Los Angeles' efforts to review, consider, and disclose to the public the environmental consequences of the Las Lomas Project. In order to assist Santa Clarita and inform the public of the whole of the actions considered on the Las Lomas Project site, Los Angeles has included Santa Clarita's prezone and annexation proposal as a project alternative in the Draft EIR.

Santa Clarita cannot circumvent CEQA requirements by simply creating a new project and willfully blinding itself to a pre-existing proposal under review by a pre-existing lead agency on the same land. Santa Clarita is also fully aware that Los Angeles has acted and will continue to act as the lead agency for the Las Lomas Project. Santa Clarita's knowledge of the foregoing is evidenced by the facts of Santa Clarita's presence at the Scoping Meeting and its written comments on the NOP, wherein Santa Clarita acknowledged Los Angeles as the lead agency for the Las Lomas Project. CEQA envisions one project and one lead agency on a single piece of property at any given time. Multiple projects proposed on the same property by separate project proponents and separate lead agencies, each describing itself as lead agency, would create the very segmentation that CEQA has long prohibited. Santa Clarita's project, therefore, contravenes CEQA's purpose of providing the fullest protection to the environment and its policy against segmentation.

V. The Use Of A Negative Declaration For Santa Clarita's Project Is Inadequate

According to the description of the Santa Clarita Project, the City proposes to prezone 811 acres of the property from its current designation as A-2-1 (Heavy Agricultural) to RE (Residential Estate) and to prezone 14 acres of the property from A-2-1 to RM (Residential Moderate). According to Section 17.15.010 of the Santa Clarita Municipal Code, permissible residential density in the RE zone is .5 dwelling units per acre, and permissible residential density in the RM zone is 11 dwelling units per acre. Accordingly, the proposed rezoning of the property could result in the development of up to 560 dwelling units on the property. Pursuant to § 15206 of the CEQA Guidelines any project that results in the residential development of more than 500 dwelling units is deemed a project of statewide, regional, or area-wide significance which must be submitted to the State Clearinghouse for review. The ND, however, states that while the Santa Clarita Project area could potentially be built out with a

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maximum of 560 units, the existing slopes would realistically only allow development of up to 360 dwelling units. Assuming, arguendo, that only 360 dwelling units could be developed, the environmental impacts remain. Development of 360 dwelling units will cause significant environmental impacts, perhaps less so than would the development of 560 dwelling units, but this does not mean that Santa Clarita is free to ignore such impacts.

Furthermore, a "project" is defined as comprising "the whole of an action" that has the potential to result in a direct or reasonably foreseeable indirect physical change to the environment. CEQA Guidelines § 15378(a). This means that Santa Clarita may not avoid preparing an EIR by segmenting a project and not considering the entirety of the Santa Clarita Project to avoid full environmental disclosure. *Bozung v. LAFCO* (1975) 13 Cal.3d 263; CEQA Guidelines § 15003(h). Piecemeal environmental review that ignores the environmental impacts of the end result is not permitted. *Christward Ministry v. Superior Court* (1986) 184 Cal.App.3d 180, 193; *City of Carmel-by-the-Sea v. Board of Supervisors* (1986) 183 Cal.App.3d 229, 251.

Santa Clarita's ND is entirely based on the contention that the Santa Clarita Project is not a "project" under CEQA. In support of this proposition the ND cites to *Bozung* alleging that under *Bozung* "An annexation...is a project if the annexation is an essential part of a development plan to urbanize property...." Santa Clarita then argues that, because no development is currently proposed, the Santa Clarita Project is not a "Project" under CEQA. Such conclusion is factually incorrect and ignores the holding of *Bozung* on this issue. In determining whether annexation is a "project" under CEQA the *Bozung* Court held that under CEQA, "project" includes acts such as enactment of zoning ordinances and adoption of a general plan. The Court stated: "The fact is that if the adoption of a general plan is a project, as the [CEQA] Guidelines provide, an annexation approval...becomes an a fortiori case." In reaching this conclusion the Court noted that while adoption of a general plan is by its very nature merely tentative and subject to change, an annexation is an irrevocable step. *Id.* at 278.

Santa Clarita relies on the fact that no development is currently proposed nor reasonably foreseeable for the Santa Clarita Project site. This is incorrect. By this letter, on behalf of Las Lomas, we notify Santa Clarita that Las Lomas intends to promptly and diligently develop the Las Lomas site regardless of what jurisdiction may govern the site. This intention is evidenced by the redacted option agreements included in Las Lomas' annexation petition, a copy of which is attached hereto. The option agreements grant Las Lomas the right to seek entitlements to develop the Las Lomas site without reference to any specific jurisdiction. If Santa Clarita succeeds with its prezone and annexation, Las Lomas will apply with Santa Clarita to develop the Las Lomas Project site. Consequently, site development is not only foreseeable, it is imminent.

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Because development is imminent, the ND provides inadequate environmental documentation for the Santa Clarita Project. Santa Clarita cannot simply conclude that the proposed rezoning of the Santa Clarita Project area from agricultural zoning to residential zoning will have no impact on the environment because no development application is presently pending with Santa Clarita. Whether an application is pending is not conclusive on the issue of reasonably foreseeable impact. *In Friends of Mammoth v. Town of Mammoth Lakes Redevelopment Agency*, (2000) 82 Cal.App.4<sup>th</sup> 511, the court clearly rejected such a position, holding instead that in conducting CEQA review an agency must consider direct and indirect physical changes in the environment which are reasonably foreseeable as a result of the proposed project. *Id.* at 527. Thus, although no actual development of the property is presently proposed in Santa Clarita, that a known developer holds development rights and is actively pursuing development is evidence enough to reasonably foresee development by rezoning the property to RM and RE.

Santa Clarita cannot postpone CEQA review until such time as development is proposed. Because the environmental impacts of the Santa Clarita Project are now reasonably foreseeable, Santa Clarita must study and investigate such impacts now. For CEQA purposes, Santa Clarita's actions will result in a number of potentially significant impacts on the environment which require review now on the basis of an EIR instead of an ND.

Santa Clarita states that its ND is tiered from its General Plan EIRs in accordance with CEQA Guidelines § 15152, which allows the use of analysis of general matters contained in a broader EIR with later EIRs or negative declarations. However, CEQA Guidelines § 15152(b) states that "Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration." Consequently, Santa Clarita must analyze the impacts listed below in greater detail.

A. Agricultural Resources

Santa Clarita proposes to rezone existing undeveloped land currently zoned for agricultural use to residential use. Santa Clarita nevertheless ignores the impact that its action may have on agricultural resources. Santa Clarita's absence of any discussion relative to the Santa Clarita Project's impact on agricultural resources renders the draft negative declaration inadequate with respect to this issue. Santa Clarita is therefore required at a minimum to discuss the potential loss of agricultural resources and recirculate its environmental document for further review and comment.

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B. Air Quality

Santa Clarita similarly disregards impacts on air quality, stating merely that because no development is proposed, no adverse impacts will be created. The Santa Clarita Project area is within the South Coast Air Basin ("SCAB") and within the jurisdiction of the South Coast Air Quality Management District. The SCAB is designated as a non-attainment area for ozone, carbon monoxide, and particulate matter. Current standard calculations for vehicle trip generation assign a trip generation factor of 1.01 peak hour vehicle trip per single family detached residence. The expected rezoning will allow the construction of up to 368 new dwelling units on currently undeveloped property. The development of this number of residential units will unquestionably result in at least 371 new vehicle trips in an area already identified as in non-attainment status for vehicle emissions such as carbon monoxide. The development of 811 acres for residential use will also result in extensive grading which will generate considerable particulate matter and other construction related emissions. To assume that impacts on air quality will not occur is simply ignoring the obvious and should be rectified and mitigation measures proposed and studied to reduce or avoid air quality impacts.

C. Biological Resources

The ND admits that portions of the Santa Clarita Project area are within a Significant Ecological Area and other potentially sensitive biological resources. Conversion of undeveloped land to allow foreseeable residential use, or impermissibly postponing the environmental review of foreseeable residential development, will result in potentially significant impacts on biological resources that may be located on the property. According to recent biological resources reports,<sup>1</sup> several sensitive plant and animal species are known to exist within the Santa Clarita Project area, including, but not limited to: Riversidian upland coastal sage scrub; Southern live oak riparian forest; Southern willow scrub; California thrasher, Bewicks wren; Prairie falcon, San Diego coast horned lizard; and Coastal western whiptail. Excellent habitat occurs within the Santa Clarita Project area for the following species and others not herein listed: Coastal California gnatcatcher, American peregrine falcon; and the Western spadefoot toad. In addition, previous studies have shown that the Santa Clarita Project area is utilized regularly as a corridor

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<sup>1</sup> Rachel Tierney Consulting (Tierney 2001); Envicom Corporation in September 2001 (Envicom 2001); Environmental Science Associates (ESA) conducted a reconnaissance survey on the Las Lomas site in October 2001; California Natural Diversity Data Base (CDFG 2001) records for the USGS Oat Mountain quadrangle; California Native Plant Society's (CNPS) Electronic Inventory (CNPS 2001); Missing Linkages (California Wilderness Coalition 2001); Sawyer and Keeler-Woolf, 1995; Hickman, 1993; and Holland, 1986. Additional information on special status species and communities of concern were obtained through the United States Fish and Wildlife Service Ventura Field Office (USFWS 2001).

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for large mammals such as bobcat, mountain lion, and gray fox.<sup>2</sup> Foreseeable residential development will grade and destroy at least some of the habitat associated with these species. Prior to approving the rezoning and annexation, Santa Clarita must complete a biological assessment to identify any threatened or endangered species or any wildlife corridors existing on the Santa Clarita Project site and mitigate any impacts identified on biological resources. Santa Clarita must evaluate the potential impacts of foreseeable residential development and identify mitigation measures to avoid or reduce potentially significant impacts.

D. Population and Housing

The draft negative declaration erroneously concludes that Santa Clarita's actions will have no impact on population and housing. Contrary to Santa Clarita's conclusion, the development of up to 368 new residential dwelling units will necessarily contribute to growth and have a potentially significant impact on population and housing.

E. Aesthetics

The proposed project can foreseeably result in development which would require extensive grading. Even with the preservation of some ridgelines according to Santa Clarita's ridgeline protection ordinances, it is axiomatic that foreseeable residential development will have a demonstrably negative aesthetic impact on undeveloped ridgelines that requires study and disclosure to the public. Such extensive grading is certain to affect the aesthetics of the Santa Clarita Project site. Santa Clarita must give proper consideration to this issue and has thus far failed to do so.

F. Hazards

With regard to hazards and hazardous materials, Santa Clarita simply offers a conclusory statement that because there is no development is reasonably foreseeable there is no risk of hazards. Because development of the Santa Clarita Project site is reasonably foreseeable, Santa Clarita must give further consideration to potential hazards and hazardous materials.

G. Mineral Resources

Santa Clarita has given no consideration to potential impact on mineral resources of the Property. Further soil assessments are necessary.

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<sup>2</sup> California Wildlife Coalition 2001; Biers (1995).



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H. Public Services

Santa Clarita has failed to show how it would meet the public services needs of the occupants of the potential 368 new residences. Santa Clarita must provide a detailed explanation as to which jurisdictions and facilities will fulfill the public services needs of the potential new residents. Increased population due to the construction of additional dwelling units will also burden existing public services such as police and fire protection, parks, schools, and utilities.

I. Utilities

Similarly, Santa Clarita fails to explain which agencies and/or jurisdictions would meet the utility needs of the potential new 368 residences and their residents. Santa Clarita must provide a detailed explanation setting forth how the utility needs will be met and which agencies will provide which services.

J. Cultural Resources

The Tataviam Indians inhabited the geographic region containing the Santa Clarita Project site. The Tataviam lived primarily on the upper reaches of the Santa Clara River drainage system east of Piru Creek. Their territory included the foothills above the San Fernando Valley, as well as the Sawmill Mountains, the Santa Clarita Valley and the southwestern fringes of the Antelope Valley. The Tataviam people are believed to be linguistically characterized as Takic speakers of the Uto-Aztecan linguistic family.<sup>3</sup>

An archeological record search indicated that no archaeological sites were known to exist on the Las Lomas Project site, although both prehistoric and historic sites had been recorded within a half-mile radius of the study boundaries, possibly within the Santa Clarita Project area. One of these is State Historic Landmark No. 1006, Beale's Cut Stagecoach Pass.

Additionally, the San Fernando Tunnel, deemed eligible for listing on the National Register of Historic Places, is located in close proximity to the Las Lomas Project site. Currently, the tunnel is being used by MetroLink.

The ND makes no mention of these potentially-impacted historical and cultural resources. Foreseeable residential development requires that mitigation measures be studied and identified to avoid or reduce potential impacts to these cultural resources.

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<sup>3</sup> King and Blackburn 1978.

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K. Water Supply

California Water Code ("CWC") Section 10910 et seq. requires that the availability of an adequate water supply be demonstrated in the CEQA process. As discussed above, development of up to 368 residential units is reasonably foreseeable as a result of the Santa Clarita Project. Therefore, pursuant to CWC Section 10910(a), for a project to be approved, Santa Clarita must provide water supply studies as part of its CEQA reports. Santa Clarita's water supply problems are well-known and well publicized. The Castaic Lake Water Agency and its distributors have been embroiled in litigation regarding whether Santa Clarita has adequate water supplies for its existing demand. By this annexation, Santa Clarita will only exacerbate its water supply deficit.

By contrast to the publicized difficulties of securing water supplies for already-approved developments in Santa Clarita, the Los Angeles Department of Water and Power has made findings specific to the Las Lomas Project that adequate water resources are available to serve the Las Lomas Project in Los Angeles.

L. Hydrology/Water Quality

The number of foreseeable single family residences allowable by the Santa Clarita Project will increase the amount of impermeable surface in the undeveloped portions of the Santa Clarita Project area significantly. Even residential estates, with their extensive landscaping, also include large homes, driveways, recreational facilities that potentially increase surface run-off. Again, the ND is silent on this issue because of its flawed premise that residential development is not foreseeable. Given the reasonably foreseeable development of up to 368 new homes, Santa Clarita must study the impact this will have on water quality standards or waste water discharge. Santa Clarita has not conducted such study.

M. Noise

Santa Clarita must assess the noise impact caused by the construction of the reasonably foreseeable development of the site. Santa Clarita has failed to properly assess the noise impacts of the Santa Clarita Project.

N. Geology/Soils

Santa Clarita has given no consideration to potential impact on the soil of the Santa Clarita Project site. Further soil assessments are necessary.

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O. Transportation/Traffic

Santa Clarita provides no traffic/transportation assessment. Current standard calculations for vehicle trip generation assign a trip generation factor of 1.01 peak hour vehicle trip per single family detached residence. The expected rezoning will allow the construction of up to 368 new dwelling units on currently undeveloped property. The development of this number of residential units will unquestionably result in at least 371 new vehicle trips in an area already accompanied by observable vehicle trip congestion during peak hours. Clearly, the Santa Clarita Project would impact traffic and public transportation and Santa Clarita must properly address this issue in order to determine whether mitigation measures are necessary to avoid or reduce impacts.

P. Cumulative Impacts

In addition to the direct impacts on the environment, Santa Clarita fails to consider cumulative impacts that the proposed rezoning of the property for residential use will create. Failure to consider the cumulative impacts of Santa Clarita's proposed action violates Section 15064 of the CEQA Guidelines which requires preparation of an EIR in the event that cumulative impacts are considerable and constitutes grounds for rejecting the draft negative declaration.

VI. Santa Clarita May Be Subject To Tort Liability

If Santa Clarita proceeds with the Santa Clarita Project, it may result in liability for Santa Clarita under the following tort theories: (i) intentional interference with contractual relationships; and (ii) intentional interference with prospective economic advantage. Las Lomas is prepared to pursue remedies under the Tort Claims Act against Santa Clarita for monetary damages resulting from Santa Clarita's attempts to arrest and frustrate Las Lomas' business and its contracts with property owners as well as business partners.

VII. Conclusion

Santa Clarita improperly asserted lead agency status in violation of CEQA and to the detriment of full disclosure. Santa Clarita has also failed to undertake adequate review of the potential consequences of the proposed rezoning in the present case. Santa Clarita cannot shield itself from CEQA requirements by ignoring or willfully blinding itself to reasonably foreseeable development. Development is reasonably foreseeable, therefore, the environmental studies must be conducted now and not postponed until development is proposed in Santa Clarita. The draft negative declaration is therefore inadequate and should be rejected. Santa

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Clarita must abandon the Santa Clarita Project and allow Los Angeles to study Santa Clarita's prezone and annexation as an alternative in the Las Lomas Project EIR.

Attached, for your convenience, are the following documents which we submitted for Santa Clarita's January 14, 2003 City Council meeting: (i) Los Angeles' objection to Santa Clarita's negative declaration, which objection equally applies to the ND as revised; and (ii) a copy of the owner-initiated petition for annexation to Los Angeles prepared by Las Lomas, which application will reconfirm notice to Santa Clarita that a proposed project has existed and currently exists on the Las Lomas Project site.

Thank you very much for your responsible attention to this matter.

Very truly yours,



R.J. Comer

RJC:kt

cc: Ms. Sharon Dawson, City Clerk (w/o encl.)  
Mr. Larry Calemine, LAFCO (w/o encl.)  
Ms. Phyllis Winger, CD 12  
Carl K. Newton, Esq., City Attorney (w/o encl.)  
Mr. Dan S. Palmer, Jr. (via Facsimile)  
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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

11 LAS LOMAS LAND COMPANY, L.L.C.,

12 Petitioner and Plaintiff,

13 vs.

14 CITY OF SANTA CLARITA and LOCAL  
15 AGENCY FORMATION COMMISSION  
for LOS ANGELES COUNTY,

16 Respondents and Defendants;

17 CITY OF LOS ANGELES; CAROLE AND  
18 FREDERICK BERGIN; THE ESTATE OF  
19 RALPH FLORA; NEWHALL  
20 CALGROVE ESTATES, L.P.; AND FRED  
AND JANET MCHADDAD; and DOES 1  
THROUGH 50,

21 Real Parties in Interest.

Case No. BS 082219

Date: November 13, 2003

Time: 9:30 a.m.

Dept.: 85

[Assigned To The Honorable Dzintra Janavs  
For All Purposes]

**PETITIONER'S OPENING BRIEF**

Date Action Filed: April 01, 2003

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## INTRODUCTION

For more than a year now, a responsible developer, Petitioner Las Lomas Land Company, L.L.C., and the City of Los Angeles have been diligently preparing a draft environmental impact report (EIR) for a proposed development project and processing the various entitlements and approvals needed to develop the 555-acre parcel. Because the Las Lomas project site lies just to the north of the existing Los Angeles boundaries, one of the governmental approvals Las Lomas seeks is approval by the Los Angeles County Local Agency Formation Commission (LAFCo) of its proposed annexation to Los Angeles. The project site also lies to the south of Santa Clarita's city limits, and Santa Clarita has decided that it would like to increase its territory to include the Las Lomas project area. The problem is that, in Santa Clarita's rush to get its rival annexation application to the LAFCo before the Los Angeles annexation, it has sacrificed compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 *et seq.*

From the beginning, Santa Clarita has characterized the site as "environmentally sensitive." In August 2002, responding to Los Angeles' notice, as lead agency, of its preparation of an EIR for the Las Lomas project, Santa Clarita demanded that Los Angeles examine a wide variety of potential environmental impacts, including, among other matters, likely problems that would be encountered by development in or near the site and its Significant Ecological Area, "sensitive wildlife corridor," wetlands, steep slopes, earthquake faults, wildland fire hazards and cultural resources. In December 2002, Santa Clarita again expressly acknowledged, in a City Council Resolution, that "any development in the Las Lomas project area will have a significant environmental impact ...."

Also in December, despite its express acknowledgement of potential environmental impacts, Santa Clarita belatedly resolved to prepare, as a rival environmental document, a Negative Declaration (ND) that would support its newly proposed rival annexation application to the LAFCo. But, instead of reviewing any potential development scenario, including development at the very levels that its pre-zoning and annexation actions would allow, Santa Clarita now claimed that no pending or future development proposal presently existed that

1 would require review of potential environmental impacts and appropriate mitigation measures.  
2 Santa Clarita asserted that no contemporaneous environmental review was ripe or required.  
3 because any necessary environmental review either had been done in past (in an EIR prepared  
4 more than ten years earlier for its original 1991 general plan), or would be done in the future as  
5 residential development proceeds under its pre-zoning (*after* the LAFCo makes its decision on  
6 Santa Clarita's annexation application). The net result is a self-contradictory, uninformative  
7 environmental document that does not meet even the most basic standards under CEQA.

8 In Santa Clarita's haste to approve its ND, it also bypassed mandatory circulation to the  
9 State Clearinghouse, despite the site's regional and area-wide significance including, for  
10 example, its admitted inclusion of a Significant Ecological Area and "sensitive wildlife  
11 corridor. Santa Clarita also cut short, by one-third, the mandatory period for public review.  
12 Each of these violations of CEQA constituted prejudicial abuse of discretion.

13 To compound matters, when it prepared its own abbreviated environmental document,  
14 Santa Clarita usurped Los Angeles' role as CEQA lead agency. It issued its rogue ND in direct  
15 violation of CEQA's one "lead agency/one environmental document" rules. This, too, renders  
16 Santa Clarita's ND invalid.

## 17 STATEMENT OF FACTS

### 18 1. Los Angeles Assumes Lead Agency Status and Launches Environmental Review of 19 the Proposed Las Lomas Development Project and Annexation to Los Angeles.

20 On May 28, 2002, Petitioner Las Lomas filed an Environmental Assessment Form  
21 (EAF) with Los Angeles, thereby initiating environmental review of its proposed development  
22 on approximately 555 acres located in the unincorporated area of Los Angeles County. The  
23 proposed Las Lomas mixed-use community development project includes:

24 [A]pproximately 5,800 dwelling units of low to very high density, 2,300,000 sf of  
25 Office/Research & Development, 250,000 sf of Community Facilities (including a  
26 K-8 school), 225,000 sf of Neighborhood Retail, a 300-room hotel, and 285 acres  
27 of open space. Proposed recreational amenities include pedestrian and bike trails,  
28 parks, a library, theaters, and a museum. The applicant also proposes to connect to  
the MetroLink commuter rail, and construct a trolley to serve the community. Five  
single-family dwellings would be demolished, and the existing transmission lines  
and cellular tower located on the southern portion of the project would be relocated  
to other portions of the site. The project would include its own wastewater  
treatment facility, alternative energy generation facilities water tank, and a series of  
pump stations....

1 9-AR 2738. The project description also identified various governmental approvals and  
2 entitlements associated with developing the site, including approval by the LAFCo of a  
3 proposed annexation petition, a general plan amendment and zoning, a specific plan, a  
4 development agreement, a vesting tentative tract map, an oak tree permit, and other  
5 miscellaneous permits (e.g., a Department of Fish and Game permit, a water quality permit).

6 Shortly thereafter, on June 18, 2002, Plaintiff petitioned the LAFCo to approve  
7 annexation by Los Angeles of the proposed development site. 9-AR 2761-2851.

8 Los Angeles promptly assumed the role of lead agency under CEQA. On June 27,  
9 2002, Los Angeles submitted to OPR's State Clearinghouse and circulated to various public  
10 agencies and the general public a Notice of Preparation (NOP) announcing that Los Angeles  
11 "will be the Lead Agency and will prepare an environmental impact report" for the project. 9-  
12 AR 2853-2855. These NOP documents described the proposed development, the associated  
13 annexation of the development site, and the other governmental approvals identified in the  
14 EAF. 9-AR 2853. They further advised that, pursuant to CEQA, Los Angeles would need to  
15 know the "views of your agency" as to the "scope and content of the environmental  
16 information" to be studied and evaluated by Los Angeles, because "[y]our agency will need to  
17 use the EIR prepared by this City when considering your permit or other approval for the  
18 project." *Id.*

19 **2. Santa Clarita Acknowledges Los Angeles' Lead Agency Status and Demands That**  
20 **Los Angeles' EIR Evaluate Site Development Under Santa Clarita's Own Planning**  
21 **and Zoning Standards.**

22 On August 9, 2002, Santa Clarita submitted extensive comments on the Los Angeles  
23 NOP. 9-AR 2985-2999. In those comments, Santa Clarita explicitly acknowledged Los  
24 Angeles' role as CEQA lead agency (9-AR 2986-2991, 2993-2999) and demanded, *inter alia*,  
25 that the Los Angeles EIR study the following potential environmental problems associated with  
26 development of the site.

- 27 • More than half of the site includes steep slopes greater than 50% and more than 25  
28 percent of the site includes slopes between 25% and 50% and allegedly contains terrain  
"not conducive to grading." The site also lies "in close proximity to several earthquake

1 faults. According to Santa Clarita, geological studies of the site needed to be performed  
2 to determine where landslides and active fault traces may exist. 9-AR 2986-2987, 2990.

- 3 • The site includes portions of a Significant Ecological Area (SEA) and various “wildlife  
4 movement corridors,” necessitating a detailed biological resources assessment. This  
5 assessment should evaluate how future development might impact “sensitive species or  
6 habitats” and should “specifically address” potential impacts “on the wildlife corridor  
7 that currently exists between Whitney Canyon and Towsley Canyon.” 9-AR 2989.
- 8 • The San Fernando Tunnel, a historic railroad tunnel constructed by Chinese workers,  
9 “runs along the edge” of the site. The tunnel is eligible for listing on the National  
10 Register of Historic Places. Potential impacts to the tunnel and Chinese laborer burial  
11 sites in the area should be addressed. 9-AR 2989.
- 12 • The site’s “natural watershed” should also be studied, particularly with respect to  
13 potential impacts of development on sensitive animal and plant species. 9-AR 2990.
- 14 • The site is located within a Potential Wildfire and Fire Hazard Area necessitating  
15 evaluation of potential risk exposure and emergency response impacts. 9-AR 2998.

16 Santa Clarita further demanded that the Los Angeles-prepared EIR should specifically evaluate  
17 the alternative of developing the Las Lomas site at a lesser density conforming to Santa  
18 Clarita’s own current planning and zoning development standards. 9-AR 2991, 2998. Last, the  
19 EIR should evaluate all pertinent annexation-related environmental factors that, under section  
20 56841 of the Government Code, the LAFCo must consider in reviewing annexation proposals,  
21 such as population, land use, topography, delivery of public services and conversion of open  
22 space. 9-AR 2992-2993.

23 **3. Los Angeles and Las Lomas Undertake Preparation of the EIR and Processing of**  
24 **Development Entitlements.**

25 Los Angeles thereupon arranged with Las Lomas for preparation of a full EIR that  
26 would, among other matters, address Santa Clarita’s comments. Las Lomas assembled a team  
27 of environmental consultants and engineers who would undertake the applicable studies and, in  
28 consultation with Los Angeles and other agencies, would prepare a draft EIR and  
accompanying technical appendices. At all times subsequent to Santa Clarita’s comments on

1 the NOP, Los Angeles and Las Lomas have devoted (and continue to devote) substantial time,  
2 effort and expense in preparing the draft EIR, as well as in processing the various entitlements  
3 and approvals for the project. For example, following a public hearing, the Los Angeles  
4 Department of Water and Power (LADWP) prepared and delivered to the City's Planning  
5 Department an LADWP Commission-approved Water Supply Availability Assessment for the  
6 project. Las Lomas has submitted to Los Angeles the first "screen check" draft EIR and traffic  
7 study, and the pertinent Los Angeles agencies and departments have subsequently proceeded  
8 with their internal review and analysis of the "screen check" draft EIR. Las Lomas has also  
9 submitted to Los Angeles a draft Specific Plan for the proposed development project. See  
10 September 10, 2003 Declaration of Lee Wagman, filed concurrently herewith.

11 **4. Santa Clarita Launches a Rival Annexation Application and Begins Preparing a**  
12 **Rival Environmental Document.**

13 Several months after commenting on the Los Angeles NOP, Santa Clarita dramatically  
14 changed its course. On December 10, 2002, Santa Clarita's City Council passed Resolution  
15 No. 02-175 expressly acknowledging that "*any development in the Las Lomas project area will*  
16 *have a significant environmental impact....*" The Resolution also proclaimed that, although  
17 Los Angeles had been acting as lead agency for the project, *Santa Clarita, not Los Angeles,*  
18 *henceforth "should be the lead agency with approval authority for any proposed development"*  
19 *at the Las Lomas site.* 10-AR 3173. (All emphasis in quotations is supplied unless otherwise  
20 noted.)

21 The City Council concurrently passed a second Resolution (No. 02-176) authorizing  
22 City staff to file an annexation and sphere of influence amendment application with the LAFCo  
23 for a rival proposed "South Santa Clarita Annexation" project. According to the Staff Report  
24 for this resolution, the 825 acres proposed for annexation included "the proposed 555 acre Las  
25 Lomas development, which has an application to the City of Los Angeles for approval of a  
26 large development project," 10-AR 3166. Nonetheless, the Resolution and the Staff Report  
27 characterized the proposed South Santa Clarita Annexation as simply encouraging "sound  
28 planning" and "well-ordered urban development patterns" in the affected territory. 10-AR



1 3175-3177, 3166-3167; 10-AR 3157-3158.

2 To implement its new strategy, Santa Clarita decided to prepare only an abbreviated ND  
3 briefly describing the proposed annexation and pre-zoning of the Las Lomas site, which would  
4 allow a much lower level of development than Las Lomas had proposed to Los Angeles. Santa  
5 Clarita apparently realized that, if it prepared an abbreviated ND, it could submit a completed  
6 annexation proposal to the LAFCo well before Los Angeles. The initial December 2002 ND  
7 described Santa Clarita's proposed pre-zoning of the project site prior to annexation as the  
8 "project" that would be subjected to its environmental review, 10-AR 3200, 3203. According  
9 to the initial ND, "no development is proposed at this time," so no potential significant  
10 environmental impacts were anticipated. 10-AR 3203, 3210-3213.

11 Commenting on the initial ND, Las Lomas immediately pointed out that, to the  
12 contrary, "a development project is proposed by Las Lomas..." Santa Clarita could not  
13 "willfully blind itself" to "a known developer with a known intention to develop the site" –  
14 even at the lower densities that Santa Clarita's pre-zoning might allow – and to the "reasonably  
15 foreseeable" environmental impacts that would flow from that development. 11- AR 3435.

16 **5. Santa Clarita's Environmental Document Sets Forth Its Rationale for Deferring**  
17 **Environmental Review of its Proposed Pre-Zoning and Annexation Actions Until**  
18 **After LAFCo Review and Action.**

19 Santa Clarita quickly rescinded the first ND and replaced it with a second one, which  
20 was issued on February 4, 2003 for a 20-day public comment period. The second ND took a  
21 different tack. Now Santa Clarita claimed that its proposed pre-zoning and annexation actions  
22 did not, after all, constitute a "project" as defined by CEQA. The revised ND thus now related  
23 merely that (a) Santa Clarita had concluded that its proposed actions did not constitute a  
24 "project" under CEQA and thus required no environmental review; (b) at present,  
25 environmental review of the proposed action's potential *site-specific* impacts would be  
26 premature and should appropriately be deferred to a future time after LAFCo acts on Santa  
27 Clarita's proposed annexation; (c) all of the potential *non-site-specific and cumulative impacts*  
28 had been evaluated in an EIR prepared more than 10 years earlier for the Santa Clarita general  
plan and that long-ago analysis should be "incorporated by reference" into the environmental

document; and (d) despite numerous environmental problems with development of the site. Santa Clarita would defer to a future time consideration of any mitigation measures for both site specific impacts and non-site specific impacts. 12-AR 3657-3661.

(a) The ND's Assertion that Santa Clarita's Proposed Actions Did Not Constitute a "Project."

According to the revised ND, Santa Clarita's proposed actions were not a "project," as defined by CEQA, because they would "not result in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment." 12-AR 3659. The ND observed:

- "There is no development plan that has been proposed which would depend on approval of the proposed annexation, nor is such a development plan reasonably foreseeable...." 12-AR 3648.
- "This annexation is *in no way* an essential part of a development plan by which a property owner intends to urbanize land currently zoned agricultural." 12-AR 3648.
- The "objective" of Santa Clarita's proposed pre-zoning and annexation actions was merely to "normalize" Santa Clarita's southern boundary, to implement its general plan within the area, and to provide a "low density" zoning standard that would be compatible with "the environmental constraints in the area." 12-AR 3654-3655.
- "[T]here is no development currently proposed, or reasonably anticipated to be proposed in the foreseeable future, which is or would be consistent with the pre-zoning that would occur as part of this annexation." 12-AR 3659.

With respect to Las Lomas' development proposals, the ND estimated that Las Lomas would potentially be able to develop only somewhere "between 34 to 86 dwelling units" under Santa Clarita's proposed pre-zoning. 12-AR 3656 fn.9, 3659. According to the ND, "it does not appear reasonably foreseeable" that Las Lomas would reduce its development proposal from the substantial levels it had proposed to Los Angeles down to Santa Clarita's much lower development levels. 12-AR 3659. Furthermore, no other affected landowner within the area to be pre-zoned had "approached [Santa Clarita] with a development project." *Id.* The proposed

1 pre-zone and annexation actions were thus “not linked to a development proposal” and instead  
2 “merely served to implement the land use designations in [Santa Clarita’s] adopted general  
3 plan....” 12-AR 3659.

4 (b) The ND’s Contention that Environmental Review of the Potential Impacts of  
5 the Proposed Actions Was Premature and Should Appropriately Be Deferred to  
6 a Future Time after LAFCo Acts on Santa Clarita’s Proposed Annexation.

7 Although Santa Clarita had earlier demanded that Los Angeles evaluate the potential  
8 environmental impacts of development of the Las Lomas site in accord with Santa Clarita’s  
9 current planning and zoning standards, it now concluded that it could avoid such environmental  
10 review in its own environmental document. For each of the many potential site-specific  
11 environmental impacts from development of the annexation area at the levels allowed by the pre-  
12 zoning, the ND contained the same canned justification for failing to evaluate these impacts:

13 Given the fact that the annexation and pre-zone are not associated with any site-  
14 specific development proposal, it is not possible to identify any site-specific  
15 impacts and thus not possible to identify any site-specific mitigation or site  
16 specific development plan revisions that would result in additional reductions in  
17 impacts from build-out of the City’s General Plan at this time. Any future  
18 development proposals within the South Santa Clarita Annexation Area will be  
19 subject to CEQA environmental review requirements, thus allowing for  
20 development of site-specific mitigations or site-specific revisions during the next  
21 tier of the environmental review process.

22 12-AR 3647-3710 *passim* (stated 15 times). As to some categories of potential environmental  
23 impacts, the ND added that various ordinances, such as its Ridgeline Preservation and Hillside  
24 Development Ordinance, should provide some future level of mitigation. 12-AR 3676, 3685,  
25 3688-3689, 3703.

26 (c) The ND’s Contention that All Potential Non-Site-Specific Impacts and  
27 Cumulative Impacts Had Been Evaluated in an EIR Prepared More Than 10  
28 Years Earlier for the Santa Clarita General Plan and that Long-Ago Analysis  
Could Be “Incorporated by Reference” into the Environmental Document.

Regarding *non-site-specific* and *cumulative* environmental impacts flowing from the  
propose pre-zoning and annexation, the revised ND simply “incorporated by reference” its  
analysis from the 1991 EIR and General Plan that had been prepared and approved more than a  
decade earlier. 12-AR 3647-3710 *passim* (cited 16 times). Santa Clarita asserted that its 1991  
EIR and general plan adequately analyzed and mitigated all of the non-site specific impacts and

1 the cumulative impacts of its proposed pre-zoning and annexation actions (such as impacts on  
2 Santa Clarita's jobs/housing balance, its population, etc.). The ND claimed that this  
3 incorporation by reference of the 1991 analysis into the February 2003 environmental  
4 document constituted a legally acceptable "tiering" under CEQA that could substitute for any  
5 *current* environmental analysis.<sup>1</sup>

6 (d) The ND's Determination that, Despite the Numerous Explicitly Acknowledged  
7 Environmental Problems with Development of the Site, Santa Clarita Should  
8 Defer to a Future Time Environmental Review of Actual Potential Impacts and  
9 Consideration of All Specific Mitigation Measures.

10 A proposed agency action that is not a "project," as defined by CEQA, does not have to  
11 comply with CEQA at all. There is no need for any environmental review and there is no need  
12 for any document that discloses and documents that environmental review. But the LAFCo had  
13 informed Santa Clarita that Santa Clarita needed to prepare and submit an environmental  
14 document to the LAFCo in order for its annexation application to be deemed "complete" and  
15 for LAFCo to begin processing that application. 10-AR 3194.

16 Santa Clarita's revised environmental document was thus put into the format of a  
17 purported ND, which set forth a few meager bits of information about the pre-zoning and about  
18 substantial development problems associated with the site. As to the overall quantity of  
19 potential development in the area to be pre-zoned, the ND asserted that as many as 566  
20 dwelling units were potentially allowed by the City's general plan for the proposed annexation  
21 area. But, relying on the extremely preliminary NOP materials circulated by Los Angeles for  
22 the Las Lomas project some six months earlier, the ND asserted that Santa Clarita's Ridgeline  
23 Protection and Hillside Development Ordinance would probably reduce the allowable densities  
24 within the annexation area to a maximum of 368 dwelling units. 12-AR 3656.

25 The ND acknowledged, *inter alia*, the following environmental problems associated  
26 with future development within the site.

27 <sup>1</sup> See February 2003 ND at 12-AR 3674-3703 (asserting that, except for impacts relating to future trip generation  
28 and local roadway construction within the proposed annexation area, the 1991 EIR on the 1991 General Plan fully  
and adequately evaluated the non-site specific and cumulative impacts, including all potential aesthetic, air quality,  
biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water  
quality, land use and planning, mineral and energy resources, noise, population and housing, public services, and  
utilities and service systems impacts) and 12-AR 3675, 3678-3684, 3686, 3688, 3693, 3700-3701 (asserting that  
the future trip generation and local roadway construction impacts of the proposed actions were fully and  
adequately evaluated in the 1997 EIR on the Circulation Element Amendment EIR).

- A Significant Ecological Area (SEA) initially designated by Los Angeles County and identified for protection by Figure OS-2 of the Santa Clarita General Plan. 12-AR 3655 fn.8. The ND does not indicate the size of the SEA, but, comparing the amount of land shown within the SEA on Figure OS-2, 3-AR 1005 with the 14 acre portion of the site to be pre-zoned to the Residential Moderate (RM) zoning classification (12-AR 3651), it appears to be roughly 30 acres. The Santa Clarita general plan describes this SEA as an "important habitat and biological resource" in which "only compatible, and where appropriate passive recreational uses" should be allowed. 3-AR 1007-1008, 1029. The 1991 general plan had proposed that an SEA overlay zoning ordinance should be established to protect SEAs within Santa Clarita (3-AR 1029), but, during the ensuing 12 years, Santa Clarita has approved no such mitigating ordinance. 12-AR 3660.
- A watershed area roughly 10 acres in size and, without further identification, a wildlife corridor. 12-AR 3650, 3655-3656. Again, despite the lack of any applicable SEA mitigation ordinance, the ND ignored any considerational mitigation for potential impacts on these environmental resources.
- An important cultural resource, the historic railway tunnel, eligible for listing on the National Register. 12-AR 3654, 3683. The 1991 Santa Clarita general plan identifies this tunnel as one of Santa Clarita's important historic resources that would potentially be protected by a future historical and cultural resources ordinance. 3-AR 1025-1026, 1036. Again, however, during the past 12 years, Santa Clarita has approved no such mitigating ordinance. 12-AR 3660.

Inexplicably, the ND failed to mention the fact that the entire area to be annexed is located within a designated Potential Wildland Fire Hazard Area (3-AR 1140 (GP at Exhibit S-6), even though Santa Clarita had previously pointed that out to Los Angeles. Nor did the ND mention the numerous other problems with site development that its August 2002 comments on the Los Angeles NOP had identified. Most tellingly, the ND ignored the Santa Clarita City Council's explicit acknowledgement only two months earlier, in Resolution No. 02-175, that

1 *"any development in the Las Lomas project area will have a significant environmental*  
2 *impact..."* 10-AR 3172.

3 Nonetheless, the ND reasoned that the proposed pre-zoning and annexation actions  
4 could be completely "de-linked" from any pending or future development proposals that might  
5 have environmental impacts, so the current actions would not themselves have any potential  
6 environmental impacts. Consequently, all further environmental review, as well as all  
7 consideration of appropriate mitigation measures, should be deferred to a future time, after the  
8 LAFCo had acted upon its proposed annexation application. 12-AR 3658-3659, 3674-3704.

9 **6. Las Lomas Informs Santa Clarita that, if Santa Clarita is Successful in Annexing**  
10 **the Parcel, It Nonetheless Intends to Develop the Site at the Highest Allowable**  
11 **Levels.**

12 Las Lomas again submitted extensive comments on the revised ND, claiming that it was  
13 legally inadequate. 12-AR 3840-3853, 3750-3753. Las Lomas claimed that both NDs had been  
14 circulated without a legally sufficient public comment period. Because Santa Clarita's  
15 environmental document should have been sent to the State CEQA Clearinghouse, it required a  
16 full 30-day public comment period, not the 20-day comment periods that both Negative  
17 declarations had provided.

18 Responding to the revised ND's claim that "it does not appear reasonably foreseeable"  
19 that Las Lomas would reduce its development proposal down to the low development level  
20 allowed by the pre-zoning, Las Lomas vigorously asserted that it intended to proceed with site  
21 development at the highest allowable levels – without regard to whether the area would  
22 ultimately be annexed to Los Angeles or Santa Clarita. 12-AR 3846. Las Lomas  
23 unequivocally stated:

24 Las Lomas intends to promptly and diligently develop the Las Lomas Site  
25 regardless of what jurisdiction may govern the site.... If Santa Clarita succeeds  
26 with its pre-zone and annexation, Las Lomas will apply [to] Santa Clarita to  
27 develop the Las Lomas project site. Consequently, site development is not only  
28 foreseeable, it is imminent.

12-AR 3846.

1 Las Lomas also protested Santa Clarita's "piece-meal" approach to its environmental  
2 review. Citing *Bozung v. Ventura LAFCo* and other cases, Las Lomas asserted that Santa  
3 Clarita could not segment its proposed pre-zoning and annexation actions from their ultimate  
4 environmental effect. 12-AR 3846. Las Lomas provided an extensive recitation of the  
5 numerous potential environmental impacts that development of the site might have, including  
6 many of the same environmental issues that Santa Clarita itself had previously raised, as well  
7 as additional new information.<sup>2</sup>

8 Las Lomas also pointed out that "CEQA allows only one lead agency" for a  
9 development project; that Los Angeles precisely met the lead agency criteria; and that, as lead  
10 agency, Los Angeles was already preparing a full EIR on the very development levels  
11 proposed by Santa Clarita's pre-zoning. Las Lomas contended that Santa Clarita could not  
12 circumvent CEQA's requirements and prepare a rival environmental document that "willfully  
13 blind[s] itself" to Las Lomas' development intentions for the site. 12-AR 3843-3845.

14 **7. Santa Clarita Approves the Pre-zoning and Annexation Application and Las**  
15 **Lomas Files Suit.**

16 On February 25, 2003, Santa Clarita nonetheless forthwith approved the pre-zoning and  
17 annexation actions. (12-AR 3743, 3835-3838). Despite the revised ND's assertion that the  
18 pre-zoning and annexation actions were not subject to CEQA at all, Santa Clarita filed its  
19 Notice of Determination on February 27, 2003 proclaiming that it had fully complied with  
20 CEQA. 12-AR 3863-3867.

21 Las Lomas timely brought this action challenging Santa Clarita's actions. Las Lomas'  
22 petition requests that the Court set aside Santa Clarita's uninformative, grossly deficient and  
23 improperly prepared ND. It also requests that, if necessary, the Court stay the LAFCo  
24 proceedings until the full EIR being prepared by Los Angeles as lead agency is completed and  
25

26  
27  
28 <sup>2</sup> Las Lomas' comments described, for example, numerous studies of the sites environmental resources that its  
own environmental consultants and others had prepared regarding the site's sensitive biological resources. These  
studies confirmed that the site "is utilized regularly as a corridor for large mammals such as bobcat, mountain lion,  
and gray fox." 12-AR 3848-3849.

1 the petition to annex the Las Lomas site to Los Angeles can be acted upon by the LAFCo. Los  
2 Angeles and Las Lomas meanwhile continue to process the full EIR, and a draft EIR is  
3 expected to be publicly circulated this Fall.

4 Las Lomas recently requested the Governor's Office of Planning and Research (OPR)  
5 to exercise its concurrent administrative power to designate a lead agency under CEQA Section  
6 21165. That section empowers OPR, when requested to resolve a lead agency dispute, to  
7 designate a lead agency within 21 days. OPR, however, declined to exercise jurisdiction.  
8 These concurrent administrative proceedings before OPR and OPR's ruling declining  
9 jurisdiction are described below and in Petitioner's Request for Judicial Notice.

### 10 STANDARD OF REVIEW

11 The "foremost principle" in interpreting CEQA is that the Legislature intended the Act  
12 to be read so as to afford the fullest possible protection to the environment within the  
13 reasonable scope of the statutory language. *Friends of Mammoth v. Board of Supervisors*  
14 (1972) 8 Cal.3d 247, 259; *Laurel Heights Improvements Ass'n v. Regents* (1988) 47 Cal.3d  
15 376, 390.

16 In determining whether a proposed governmental action "may have a significant effect  
17 on the environment" and thus requires preparation of a full EIR, rather than a mere negative  
18 declaration, the courts use the "fair argument" test. Because of the EIR's place at the "heart" of  
19 CEQA, an EIR is required "whenever it can be fairly argued on the basis of substantial  
20 evidence that the project may have significant environmental impact," regardless of whether  
21 other substantial evidence supports the opposite conclusion. *Communities for a Better*  
22 *Environment v. California Resources Agency* (2002) 103 Cal.App.4th 98, 106. A negative  
23 declaration may be prepared only when "[t]here is no substantial evidence in light of the whole  
24 record that the project may have a significant effect on the environment". Pub. Res. Code §  
25 21080(c)(1). This statutory language is intended to express the "fair argument" standard. *See*  
26 *e.g., Laurel Heights Improvement Ass'n*, 6 Cal.4th at 1114, fn. 20.



1 The "fair argument" standard of review also applies to the court's review of whether an  
2 agency can avoid compliance with CEQA by claiming that its actions do not constitute a  
3 "project." *Friends of "B" Street v. City of Hayward* (1980) 106 Cal.App.3d 988; *City of*  
4 *Livermore v. LAFCo of Alameda County* (1986) 184 Cal.App.3d 531.

5 The "fair argument" test also applies to the question of whether an agency has properly  
6 "tiered" an environmental analysis from a prior program-level EIR. *Sierra Club v. County of*  
7 *Sonoma* (1992) 6 Cal.App.4th 1307, 1319.

8 The determination of which agency properly serves as "lead agency" for a proposed  
9 project is made by the Court as a matter of law without any deferential review. *Planning and*  
10 *Conservation League v. Dept. of Water Resources* (2000) 83 Cal.App.4th at 892, 906-07.

## 11 ARGUMENT

### 12 I. SANTA CLARITA'S ENVIRONMENTAL DOCUMENT FOR ITS PROPOSED 13 PRE-ZONING AND ANNEXATION ACTIONS WAS INVALID, BECAUSE IT 14 WAS NOT BASED ON A CONTEMPORANEOUS CEQA ENVIRONMENTAL 15 REVIEW OF THE POTENTIALLY SIGNIFICANT ENVIRONMENTAL 16 IMPACTS OF, AND MITIGATION MEASURES FOR, FUTURE SITE 17 DEVELOPMENT.

18 In belatedly launching its rival pre-zoning and annexation actions, Santa Clarita at first  
19 claimed that it could prepare a rival environmental document for a rival "project." After  
20 reconsidering the matter, Santa Clarita's revised ND asserted that the proposed pre-zoning and  
21 annexation actions did not constitute a "project" under CEQA, so they did not require any  
22 environmental review or any environmental document. Nevertheless, because the LAFCo had  
23 informed Santa Clarita that it needed to submit an environmental document with its annexation  
24 application, in order for it to be considered "complete," Santa Clarita prepared a document that  
25 it labeled a "Negative Declaration," even though that document basically summarized Santa  
26 Clarita's arguments for postponing environmental review of those proposed actions.

27 Santa Clarita's revised ND was a contradiction in terms. On one hand, it denied that the  
28 proposed pre-zoning and annexation actions constituted a "project" under CEQA, because no  
specific development applications were pending before Santa Clarita and any potential ultimate  
development impacts were thus supposedly speculative. On the other hand, it purported to be  
an environmental document under CEQA that satisfactorily documented Santa Clarita's

1 contemporaneous environmental review of the impacts of potential site development.

2       **A. Before Approving Its Proposed Pre-zoning and Annexation Actions, Santa**  
3       **Clarita Needed to Undertake Environmental Review of those Actions.**

4       The first question the Court must confront regarding the legal sufficiency of Santa  
5 Clarita's approach to environmental review is Santa Clarita's erroneous legal contention that its  
6 proposed pre-zoning and annexation actions did not constitute a "project," and were thus  
7 exempt from the need for CEQA environmental review.

8               1. Proposed Pre-zonings Require CEQA Review If They May Ultimately  
9               Result in Potential Environmental Impacts.

10       There can be no debate about whether a city's proposed zoning of an area normally  
11 constitutes a "project" under CEQA requiring environmental review. Section 21080(a)  
12 specifically includes "the enactment and amendment of zoning ordinances" within the types of  
13 "projects" to which CEQA applies. Zone changes are "projects" that must comply with CEQA,  
14 even where no specific development proposal has been formally submitted by a landowner to  
15 the city. *See City of Carmel-by-the-Sea v. Board of Supervisors* (1986) 183 Cal.App.3d 229.  
16 There, a city proposed to re-draw a zoning boundary near a wetland. Even though no  
17 development plans had been submitted by the landowner to the city and even though the zone  
18 change would supposedly just implement the city's general plan, the Court of Appeal ruled that  
19 an EIR was required because the re-zoning could ultimately result in potential environmental  
20 impacts. *Id.* at 252.

21       Similarly, in *Rural Landowners Ass'n v. Lodi City Council* (1983) 143 Cal.App.3d  
22 1013, the Court of Appeal ruled that a proposed zoning ordinance required CEQA review and  
23 the environmental document should have analyzed potential impacts from ultimate  
24 development under the re-zoning and the pending annexation of other nearby land. Citing  
25 CEQA Guidelines section 15378(a), the court observed that the term "project" under CEQA  
26 encompasses "the whole of the action," and a city cannot avoid CEQA "by limiting the title or  
27 description of a project." *Id.* at 1025.  
28

2. Proposed Annexations Also Require CEQA Environmental Review If They May Ultimately Result in Potential Environmental Impacts.

Santa Clarita's proposed annexation action, too, was clearly subject to CEQA. The California Supreme Court's decision in *Bozung v. Ventura County LAFCo* (1975) 13 Cal.3d 263 is the leading case. There, the City of Camarillo contended that its proposed annexation of a 677-acre site did not constitute a "project" under CEQA, because it would have no direct environmental impacts and because, when more specific entitlements applications were presented to it, all environmental impacts from future development could be evaluated in a later-prepared environmental document. The site's landowner supported Camarillo's annexation application by answering a questionnaire to the effect that it anticipated developing the site "for residential, commercial and recreational uses" "in the near future." *Id.* at 271.

The Supreme Court observed that, in determining whether to approve the annexation, the LAFCo needed to consider a variety of environmental considerations, including population, population density, topography, and the annexation's potential effect on adjacent areas and on mutual social and economic interests, and the LAFCo annexation approval would be "an irrevocable step as far as that particular agency is concerned." *Id.* at 279. Consequently, even though later EIRs might be prepared for the city's benefit, this would be of little use after-the-fact to the LAFCo. The Supreme Court also cited the desirability of preparing and considering environmental documents "at the earliest stage" and the need to avoid submerging environmental considerations by "chopping a large project into many little ones – each with a minimal potential impact on the environment – which cumulatively may have disastrous consequences." *Id.* at 283-85. Because the annexation could facilitate ultimate development of the site, it required CEQA environmental review. *Id.* at 281.

Similarly in *People ex rel. Younger v. LAFCo of San Diego County* (1978) 81 Cal.App.3d 464, a petition to de-annex an area from the City of San Diego was filed with the LAFCo, seeking to relieve the area from the obligation to comply with city land use controls. The Court held that the proposed de-annexation action constituted a "project" under CEQA and required that an EIR be prepared that would, *inter alia*, compare and evaluate the respective

land use restrictions that the competing jurisdictions had imposed, or would impose, within the area to be annexed. *Id.* at 480-81.

Likewise, in *Pistoresi v. City of Madera* (1982) 138 Cal.App.3d 284, a city proposed to annex an area and zone it for residential development uses that would be essentially similar to the uses previously allowed by county zoning in the unincorporated area. The Court of Appeal held that the city nonetheless had to prepare a full EIR, rather than a negative declaration, in order to analyze the impacts of potential future residential development that would merely be “accelerated” by the proposed annexation.<sup>3</sup> *Id.* at 288.

3. The Proposed Pre-Zoning and Annexation Actions Here Could Not Be “De-Linked” from Pending and Future Development Proposals in Order to Exempt them from CEQA Review.

Despite the February 2002 ND’s bold proclamation that Santa Clarita’s proposed pre-zoning and annexation actions were not subject to CEQA, because they were not “linked” to any pending or future development proposal, those proposed actions clearly required environmental review regarding their ultimate development consequences and appropriate mitigation measures. Las Lomas repeatedly pointed out to Santa Clarita that it intended to develop the 555-acre area in question at the allowed density in the near future, no matter which jurisdiction controlled development at the site. Further, Santa Clarita’s pre-zoning authorized development of another 282 residential units on the remaining 270 acres – an ultimate land use that could certainly ensue once that acreage was annexed to Santa Clarita. The ultimate

<sup>3</sup> In *City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398, a county’s general plan set forth a policy to approve or disapprove development proposals within the spheres of influence of adjacent cities in conformance with the city’s applicable land use policies. Without preparing an EIR, the county amended the general plan to give itself discretion to approve or disapprove such development irrespective of the city’s policies. The County’s negative declaration contained certain canned, repeated statements disclaiming the potential for any particular environmental effects from the proposed action. When certain cities claimed that the County should have first evaluated the potential environmental impacts from the change in its general plan policy, the Court of Appeal held that an EIR was required. The County’s canned, repetitive negative declaration represented only “token observance” of CEQA. The County needed to consider the “ultimate consequences” of the general plan policy change, including all “reasonably anticipated future development” that might be impacted one way or the other by the change. *See also City of Livermore v. LAFCo* (1986) 183 Cal.App.3d 681 (LAFCo’s approval of proposed sphere of influence guidelines, which deleted a prior policy to require urban environment within city boundaries, required an EIR, because, aside from any specific development projects that might be pending, ultimate development patterns may be altered by the policy). *Cf. City of Antioch v. City Council of City of Pittsburgh* (1986) 187 Cal.App.3d 1325 (developer’s proposed road construction project could not be viewed “in a vacuum” and, in determining whether to prepare EIR, other possible land uses, whose ultimate development might be facilitated by the road, needed to be considered).

1 environmental consequences of these potential development uses needed to be evaluated by  
2 Santa Clarita before it took its actions. *City of Carmel-by-the-Sea* and other appellate decisions  
3 require that CEQA review must consider the ultimate environmental effects of a city's  
4 proposed zoning actions, even where no development proposal is presently pending. *Bozung*  
5 specifically ruled that similar environmental consequences must be considered by the LAFCo,  
6 before it makes an "irrevocable" decision to approve the annexation.

7 Notably, the Los Angeles County LAFCo insists that cities proposing to annex land  
8 must prepare environmental documents, because LAFCo wishes to take advantage of certain  
9 provisions in the CEQA Guidelines allowing LAFCOs to avoid preparing their own  
10 environmental documents on proposed annexations, when a city has pre-zoned the area in  
11 question. Under section 15050(b)(2), LAFCo can be the "responsible agency" reviewing the  
12 city's environmental document. But, in order for this section to be operative, the city must first  
13 "prepare the appropriate environmental document at the time of the pre-zoning." This city-  
14 prepared environmental document must, of course, provide LAFCo with the information and  
15 analysis it needs to consider about the environmental ramifications of a requested annexation  
16 approval. *Bozung* identified the environmental factors that LAFCOs must consider and Santa  
17 Clarita earlier demanded that the Los Angeles-prepared environmental document should  
18 evaluate those environmental factors on behalf of the LAFCo. As the Supreme Court noted in  
19 *Bozung*, once the LAFCo makes its annexation approval decision, that decision is "irrevocable"  
20 as to it. Consequently, the ND's repeated assertions that environmental review of the proposed  
21 pre-zoning and annexation actions should be deferred until after the LAFCo had approved that  
22 annexation flew in the face of both *Bozung* and section 15050(b)(2).

23 **B. Santa Clarita's Negative Declaration Improperly Postponed Environmental**  
24 **Review to a Future Time and Ignored the Many "Reasonably Foreseeable"**  
25 **Site-Specific Significant Environmental Impacts Potentially Resulting from**  
**Development in the Area Proposed to Be Pre-zoned and Annexed.**

26 Because Santa Clarita proceeded on the erroneous premise that its proposed pre-zoning  
27 and annexation did not constitute a "project" and were therefore exempt from CEQA  
28 environmental review, its environmental document was profoundly flawed. Rather than  
contemporaneously analyzing the potential environmental impacts that may result from

1 ultimate development under the development standards allowed by the pre-zoning, and the  
2 appropriate mitigation measures that could mitigate those potential impacts, the environmental  
3 document essentially recounted merely how review of all such potential site-specific  
4 environmental impacts could be deferred to the future.

5 If Santa Clarita had pursued actual contemporaneous environmental review, its initial  
6 study would have examined potential future site development and the significant environmental  
7 impacts potentially resulting from that development. Once it had ascertained the level of those  
8 potential significant impacts, it would ascertain what measures should be applied to reduce  
9 those impacts below levels of "significance." When this initial study review was completed,  
10 Santa Clarita would then have made its factual determinations and findings as to whether, after  
11 all such mitigation measures were applied, the remaining environmental impacts would exceed  
12 applicable "thresholds of significance." If potentially "significant" environmental impacts  
13 remained, an EIR would be required. If they did not, a mitigated negative declaration would be  
14 required. If no mitigation measures at all were needed to reduce potential impacts below  
15 applicable levels of "significance," a simple negative declaration would be appropriate. See  
16 CEQA Guidelines §§ 15063, 15064, 15070 to 15081.

17 Unless this Court were to agree with Santa Clarita that, as matter of law, its pre-zoning  
18 and annexation actions require no CEQA review, the Court would next evaluate the evidence  
19 considered by Santa Clarita to ascertain if, following Santa Clarita's environmental review  
20 there is no substantial evidence upon which a fair argument could be made that potentially  
21 significant environmental impacts may exist. Only if there is no such substantial evidence can  
22 Santa Clarita's action be upheld. Tellingly, Santa Clarita has never contended that there is no  
23 substantial evidence of potential significant impacts from future site development, even at the  
24 modest levels allowed by its pre-zoning. In fact, Santa Clarita has explicitly proclaimed that  
25 "any development in the Las Lomas project area will have a significant environmental  
26 impact...." 10-AR 3172. Santa Clarita's comments on the Los Angeles NOP further recounted  
27 in detail the environmental problems likely to be encountered by any development within the  
28 Las Lomas area, including its Significant Ecological Area and its wildlife corridor resources, its

1 cultural resources, its wetlands, its potential geological problems, including steep slopes and  
2 nearby earthquake faults, and its wildland fire hazard characteristics. Santa Clarita specifically  
3 demanded that Los Angeles evaluate these environmental problems for various development  
4 scenarios, including development at the level allowed by Santa Clarita's own pre-zoning.  
5 Santa Clarita's general plan also described these environmental problems, and its ND again  
6 acknowledged numerous environmental problems associated with development of the site. Las  
7 Lomas' comments on the ND provided still further information to Santa Clarita about these  
8 environmental challenges and the need for mitigation.

9 Santa Clarita's only response to any of this was to "de-link" its proposed pre-zoning and  
10 annexation actions from any pending or future development proposals and to have the ND posit  
11 a patently fictional premise that at present "no development" of any kind is "reasonably  
12 foreseeable" at the site. 12-AR 3648.<sup>4</sup> This "no reasonably foreseeable" development fiction  
13 was, of course, supported by no evidence of any kind and was explicitly belied by Las Lomas'  
14 repeated assertions that it intends to develop the site at whatever levels are authorized. Yet  
15 under CEQA, "substantial evidence" cannot be based on mere "speculation [or] unsupported  
16 opinion." Pub. Res. Code § 21082.2(c). Beyond this, under its statutory directives, the LAFCo  
17 must consider whether to approve the proposed annexation "*consistent with the planned and*  
18 *probable use of the property based upon the review of general plan and pre-zoning*  
19 *designations.*" Gov. Code § 56375(e).<sup>5</sup> Consequently, Santa Clarita's environmental document  
20 should have provided LAFCo, at minimum, with an evaluation of the environmental impacts

21  
22 <sup>4</sup> In determining what impacts must be taken into account, CEQA, the CEQA Guidelines and the appellate  
23 decisions all agree that Santa Clarita should have taken into account all "reasonably foreseeable" future  
24 development that may directly or indirectly ensue from a proposed agency action. In *Bozung*, for example, the  
25 Supreme Court held that, even though the LAFCo's approval of the challenged annexation was merely the first  
26 step in a chain of events that could lead to potential development, an EIR was required because the applicant's  
27 annexation request forms had briefly noted that future development was contemplated. *Bozung, supra*, 13 Cal. 3d  
28 at 279-81. See Pub. Res. Code § 21065 ("project" means a proposed agency activity that "may cause either a  
direct physical change in the environment or a reasonably foreseeable indirect physical change in the  
environment); CEQA Guidelines § 15064(d) (in evaluating the significance of the environmental effects of a  
project, the agency "shall consider direct physical changes in the environment which may be caused by a project  
and reasonably foreseeable indirect physical changes in the environment). See also *Laurel Heights Improvement*  
*Ass'n v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376 (environmental review must consider all direct and  
indirect "reasonably foreseeable" potential consequences and impacts of a proposed agency action).

<sup>5</sup> Gov. Code § 56375(e) forbids Santa Clarita, except under extraordinary circumstances, from changing the level  
of development allowed by the pre-zoning for a period of two years.

1 that would potentially ensue from the "planned and probable use of the property based upon the  
2 ... general plan and pre-zoning designations."

3 Additionally, consistent with the *People ex rel. Younger* decision, the environmental  
4 document provided to LAFCo should have analyzed the comparative environmental impacts of  
5 the different levels of development that the competing jurisdictions would impose. Unlike the  
6 Los Angeles-prepared EIR, which, as Santa Clarita has demanded, will do precisely that, Santa  
7 Clarita's own environmental document provided no such comparative environmental analysis.

8 **C. Santa Clarita Improperly Avoided Consideration of Any Non-Site-Specific  
9 and Cumulative Environmental Impacts by "Incorporating by Reference"  
10 An Out-of-Date Analysis Made More Than Ten Years Ago in the EIR  
11 Prepared for its 1991 General Plan.**

12 The Santa Clarita ND also improperly avoided any environmental review of the *non-site*  
13 *specific* environmental impacts (e.g., population, jobs/housing balance, etc.) and *cumulative*  
14 impacts potentially ensuing from the proposed pre-zoning and annexation actions. According  
15 to Santa Clarita, more than ten years earlier, the 1991 EIR for the 1991 General Plan had  
16 considered these non-site specific impacts and cumulative impacts and had provided sufficient  
17 mitigation for them, so no contemporary environmental analysis or consideration of these  
18 potential impacts was needed. Santa Clarita's only justification for avoiding contemporary  
19 environmental review through its "incorporation by reference" technique was to invoke  
20 CEQA's concept of "tiering."<sup>6</sup>

21 CEQA authorizes tiering as a way of allowing still valid prior first-tier environmental  
22 analysis contained in earlier-prepared EIRs for plans and programs to be relied upon, and under  
23 certain circumstances, incorporated by reference into later second-tier environmental  
24 documents. Pub. Res. Code § 21068.5. Generally, the earlier EIR analyzes broad

25 <sup>6</sup> The ND stated that it incorporated by reference the non-site specific and cumulative impact analysis from:

- 26 • The Final [EIR] for the Santa Clarita General Plan, June 1991. State Clearinghouse Number: 90010683,  
27 and
- 28 • The City of Santa Clarita Circulation Element Final [EIR], September 1997. State Clearinghouse  
Number: 96112028.

12-AR 3660. The ND asserted that, except for impacts relating to future trip generation and local roadway  
construction within the proposed annexation area, the 1991 EIR on the 1991 General Plan fully and adequately  
evaluated – and mitigated – all *non-site specific* and *cumulative* impacts of the proposed pre-zoning and  
annexation actions relating to the potential aesthetic, air quality, biological resources, cultural resources, geology  
and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral and  
energy resources, noise, population and housing, public services, and utilities and service systems impacts of the  
proposed pre-zoning and annexation actions. 12-AR 3658, 3659, 3674-3703.



1 environmental issues involving plans or programs, and the second-tier environmental document  
2 “provides more detailed examination of specific effects on later projects that are consistent with  
3 or implement the plans or programs.” CEQA Guidelines Discussion following section 15385.  
4 Here, of course, the supposed second-tier environmental document, in fact, contained no  
5 environmental review at all.

6 Furthermore, the second-tier environmental analysis must include an initial study that  
7 considers the question of whether all broad environmental issues that are to be dealt with  
8 pursuant to incorporation by reference were “examined in sufficient detail” in the first-tier EIR  
9 that they *can* “*be mitigated or avoided*” by site specific revisions, the imposition of conditions  
10 or by other means in connection with the approval of the later project.” Pub. Res. Code §  
11 21094(a). In this regard, Santa Clarita’s “incorporation by reference” tiering approach  
12 erroneously postulated that all of the mitigation measures and ordinances that the 1991 EIR and  
13 general plan had anticipated, and relied on, to help mitigate the consequences of future  
14 development in Santa Clarita have been implemented. In fact, however, as seen above, several  
15 key ordinances that the 1991 general plan once specifically envisioned as providing mitigation  
16 (e.g., the once-proposed SEA mitigation ordinance and the cultural resources ordinance) have  
17 never been approved.

18 Further, tiering cannot be used in a second-tier environmental document to address  
19 *cumulative* impacts unless those impacts have been “adequately address in the prior EIR[.]”  
20 CEQA Guidelines § 15152(f)(1). “Adequately addressed” means, *inter alia*, that those  
21 cumulative impacts “have been examined at a sufficient level of detail in the prior [EIR] to  
22 enable those effects to be mitigated or avoided” by specific revisions, conditions or other  
23 means. CEQA Guidelines § 15152(f)(3)(B). As to this criterion, it is useful to consider some of  
24 the cumulative environmental impacts that have occurred within Santa Clarita in the dozen  
25 years since the 1991 EIR and general plan were approved.

26 During this period, Santa Clarita has completed over 20 annexations involving fully  
27 44,381 existing and future residents, who reside in 12,257 existing and proposed housing units  
28 on a total land area of 5,236 acres. The population added since preparation of the 1991 EIR

1 totals almost 30 percent of Santa Clarita's estimated 2002 population of 151,968, and the added  
2 land area comprises more than 20 percent of Santa Clarita's original land area of 25,227 acres.  
3 9-AR 2964. Beyond this, another 2,667 housing units are currently proposed in some seven  
4 additional pending annexations.<sup>7</sup> See July 28, 2003 *Completed and Proposed Annexations* by Santa  
5 Clarita, [www.santa-clarita.com/cityhall/admin/technology/gis/maps\\_av\\_pics/annex.pdf](http://www.santa-clarita.com/cityhall/admin/technology/gis/maps_av_pics/annex.pdf) attached  
6 as Exhibit 3 to Request for Judicial Notice filed concurrently herewith.

7 Furthermore, in the period between 1990 and 1998, Santa Clarita grew within its  
8 original territorial boundaries from 38,484 households to 43,864 households, an increase of  
9 5,380 households or almost 14 percent. In this same time period, another 6,417 households  
10 were added through annexations, another 17 percent. Combined, this extraordinary increase of  
11 11,797 households constituted fully 30 percent growth in just eight years. Internal growth  
12 added an additional 1,314 households in 1999 and 2000. 3-AR 676-677. According to Santa  
13 Clarita's 2001 Housing Element, this on-going "substantial growth" "not only translated into an  
14 equally significant increase in population," but also placed "a greater burden on [Santa Clarita's  
15 local services and infrastructure." Santa Clarita's employment base similarly expanded from  
16 45,121 to 55,898 during the ten-year 1990 to 2000 period (an increase of 10,777 jobs or 23  
17 percent), as the City "add[ed] commercial and industrial space and attract[ed] more residents  
18 wishing to work in the area." 3-AR 727.

19 In light of these telling statistics, there can be little doubt that they provide substantial  
20 evidence of a "fair argument" of potential non-site specific and cumulative impacts that the  
21 1991 EIR on Santa Clarita's general plan never addressed. The out-of-date 1991 evaluation  
22 cannot properly be incorporated by reference into the 2003 environmental document in lieu of  
23 any contemporary environmental review and analysis.

24  
25  
26 <sup>7</sup> Santa Clarita has acknowledged at least 24 completed and 7 currently proposed development project annexation  
27 proposals. Aside from the South Santa Clarita Annexation, the currently proposed annexations involve  
28 approximately 2,667 existing and proposed residential units. *Id.* The annexations completed since 1991 have  
involved fully 12,257 existing and proposed units and fully 44,381 existing and future residents. 9-AR 2964.  
Notably, the estimated 44,381 existing and potential resident population in these already-completed annexations  
would comprise almost 30 percent of Santa Clarita's total 2002 estimated population of 151,968. These completed  
annexations involved total land of 5,236 acres -- more than 20 percent of Santa Clarita's original city area of  
25,227 acres. 9-AR 2964.

1 II. IN ITS HASTE TO APPROVE ITS PROPOSED ANNEXATION AND  
2 ACCOMPANYING ENVIRONMENTAL DOCUMENT AHEAD OF LOS  
3 ANGELES, SANTA CLARITA VIOLATED CRITICAL PUBLIC NOTICE AND  
4 REVIEW REQUIREMENTS.

5 Rushing to complete its environmental document and its annexation application, Santa  
6 Clarita flagrantly violated key public notice and review requirements. More troubling still,  
7 Santa Clarita took these unlawful shortcuts knowingly, having just been reminded of the strict  
8 notice period requirements by Los Angeles and Las Lomas, *see* 11-AR 3365, 3351, 3434, 12-  
9 AR 3750-3751. This failure to comply with mandated CEQA procedures constitutes a  
10 prejudicial abuse of discretion that renders the ND legally insufficient and invalid.

11 A. Santa Clarita Failed to Submit its Proposed Negative Declaration to the  
12 OPR's State Clearinghouse.

13 Santa Clarita clearly violated the mandatory notice procedures and requirements by  
14 failing to circulate notice of its proposed ND through the OPR State Clearinghouse. Under  
15 section 15205(a) of the CEQA Guidelines, all draft negative declarations to be reviewed by any  
16 state agency must be submitted to the Clearinghouse. Santa Clarita itself requested review of  
17 the draft ND by Caltrans and a few other state agencies, 11-AR 3637-39. Having so requested  
18 review by a state agency, Santa Clarita triggered the need for submission to the Clearinghouse.

19 Similarly, proposed negative declarations on projects of "statewide, *regional* or  
20 *areawide* significance" must also be submitted to the Clearinghouse. *See* CEQA Guidelines  
21 §§ 15205(b)(3); 15073(d). Sufficient opportunity for agency consultation is especially critical  
22 in "regional or areawide" projects involving hundreds of acres in other jurisdictions and  
23 involving rival annexation applications, as is the case here.

24 In addition, CEQA Guidelines Section 15206(b) specifically identifies "generat[ion of]  
25 significant amounts of traffic..." as an example of "statewide, regional, or areawide  
26 significance." According to Santa Clarita's own ND, Santa Clarita's annexation lies "at the  
27 intersection of the two major freeways that connect the Santa Clarita Valley with the remainder  
28 of Los Angeles County" and influences "the proper flow of people and goods on these  
important access corridors." 12-AR 3655-3656.<sup>8</sup>

<sup>8</sup> Section 15206(b) also identifies as of "statewide, regional or areawide significance" projects with potential build-out of more than 500 homes. Santa Clarita's proposed pre-zoning would potentially allow up to 560 homes. 11-AR 3351.

1 Section 15206(b) also requires that negative declarations for actions potentially  
2 affecting "sensitive wildlife habitats" be submitted to the Clearinghouse. Here, Santa Clarita  
3 has expressly acknowledged that the site contains both a Significant Ecological Area and a  
4 "sensitive wildlife corridor." 9-AR 2754.

5 This mandated CEQA procedure ensures that all appropriate agencies are consulted and  
6 given an adequate opportunity to review and comment on any potential environmental impacts.  
7 See Discussion of CEQA Guidelines § 15205. Failure to submit the draft ND to the  
8 Clearinghouse constitutes prejudicial abuse of discretion. See *Gentry v. City of Murrieta* (1995)  
9 36 Cal.App.4th 1359, 1388; *Fall River Wild Trout Found. v. County of Shasta* (1999) 70  
10 Cal.App.4th 482, 492.

11 **B. Santa Clarita Rushed its Decision Through Without Providing the CEQA-**  
12 **Mandated Minimum Period for Public Review.**

13 Santa Clarita not only failed to circulate the draft ND through the Clearinghouse, it  
14 flagrantly disregarded the 30-day mandatory period for public and agency review. See CEQA  
15 § 21091(b); CEQA Guidelines §§ 15072, 15105, 15205 (requiring at least 30 days for public  
16 and agency review of proposed negative declarations that need to be submitted to the  
17 Clearinghouse). In fact, Santa Clarita was in such a rush that it failed even the minimum  
18 review period that applies to *localized* small projects without any regional or areawide  
19 significance – requiring public notice be posted by the county clerk for a full 20 days. See  
20 CEQA § 21092.3.<sup>9</sup> On February 6, 2003, Santa Clarita filed its public notice with the Los  
21 Angeles County Clerk, who posted it for public review that same day. 12-AR 3641. Before the  
22 notice had been posted for the required 20 days, however, Santa Clarita adopted the ND on  
23 February 25, 2003. 12-AR 3830-3832.

24 Such failure to comply with these strict review requirements is presumed to be  
25 prejudicial. See *Burrtec Waste Industries, Inc. v. City of Colton* (2002) 97 Cal.App.4th 1133  
26 (failure to properly post a negative declaration for public review "means the City may have  
27 been deprived of information necessary to informed decision-making and informed public

28 <sup>9</sup> See also CEQA Guidelines § 15072(d) and Discussion (confirming that the county clerk must post the notice for  
at least "20 days during the review period"); CEQA § 21090(b) ("public review period for a proposed negative  
declaration or proposed mitigated negative declaration shall not be less than 20 days").

1 participation").<sup>10</sup> Strict enforcement of the full notice and review period is particularly  
2 important for proposed actions involving, as here, issues of statewide, regional or areawide  
3 significance. The longer 30-day period was required for such proposed actions in recognition  
4 of the additional time and care needed to properly review them. Moreover, strict enforcement  
5 of CEQA's public notice and review procedures is all the more important when the document  
6 being reviewed is a proposed negative declaration, because negative declarations have a  
7 "terminal effect" on the environmental review process that lies at the heart of CEQA. See  
8 *Plaggmier v. City of San Jose* (1980) 101 Cal.App.3d 842, 853-56.

9 **III. SANTA CLARITA'S EFFORT TO USURP LOS ANGELES' LEAD AGENCY**  
10 **ROLE AND PREPARE A RIVAL ENVIRONMENTAL DOCUMENT VIOLATED**  
11 **CEQA'S FUNDAMENTAL "ONE LEAD AGENCY AND ONE**  
12 **ENVIRONMENTAL DOCUMENT" REQUIREMENTS.**

13 The lead agency plays a "crucial" and "pivotal" role under CEQA, because it has basic  
14 responsibility for the process by which an environmental document is prepared, approved and  
15 certified. The lead agency's decisions about the scope of environmental review, about how the  
16 environmental review will be conducted and about the ultimate outcome of that review are  
17 critical to the outcome of a successful environmental process. *Planning and Conservation*  
18 *League v. Dept. of Water Resources* (2000) 83 Cal.App.4th 892, 903-04.

19 **A. To Promote Comprehensive Environmental Review, CEQA Establishes**  
20 **Fundamental "One Lead Agency/One Environmental Document" Rules.**

21 Section 21165 of CEQA provides that "[w]hen a project is to be carried out or approved  
22 by two or more public agencies, the determination of whether the project may have a  
23 significant effect on the environment shall be made by the lead agency" and "such lead  
24 agency shall prepare...the [EIR] for the project." Section 15050(a) of the CEQA Guidelines  
25 implements CEQA's "lead agency concept," specifically providing for only one lead agency  
26 and only one environmental document:

27 Where a project is to be ... approved by more than one public agency, one  
28 public agency shall be responsible for preparing an EIR or negative  
declaration for the project. This agency shall be called the lead agency.<sup>11</sup>

<sup>10</sup> See also *Gentry*, 36 Cal.App.4th at 1384-93; *Plaggmier v. City of San Jose* (1980) 101 Cal.App.3d 842, 853-56 (emphasizing the importance of adequate opportunity to protest the conclusions of a proposed negative declaration because negative declarations have a 'terminal effect' on the environmental review process).

<sup>11</sup> The CEQA Guidelines provide that two or more agencies can serve as joint lead agencies, but only by mutual agreement. Section 15051(d).

1 The lead agency is charged with making the key decisions regarding preparation of the  
2 CEQA environmental document, including the initial decision of whether to prepare a full EIR  
3 or an abbreviated negative declaration. Pub. Res. Code § 21165. That determination by the  
4 lead agency is “binding and conclusive” as to all other agencies. CEQA Guidelines §  
5 15050(c). Once the lead agency determines what kind of environmental document to prepare,  
6 all other agencies *must* use that environmental document. *Id.* at §§ 15050(b), 15096.<sup>12</sup>

7 The “one lead agency/one environmental document” rule is designed to further  
8 comprehensive environmental analysis and to discourage “piecemealing” and segmentation of  
9 proposed projects. Section 21002.1 of CEQA provides that “[t]he lead agency shall be  
10 responsible for considering the effects, both individual and collective, of *all activities involved*  
11 *in a project.*” The CEQA Guidelines mandate that the lead agency “must consider the *whole of*  
12 *an action, not simply its constituent parts,* when determining whether it will have a significant  
13 environmental effect.” CEQA Guidelines § 15003. California’s courts have ruled that lead  
14 agencies have a duty to produce “comprehensive” environmental documents that will be of use  
15 to all pertinent responsible agencies as those agencies later consider their particular approval  
16 actions for the underlying project. *See, e.g., Save San Francisco Bay Ass’n v. San Francisco*  
17 *Bay Conservation and Dev. Comm’n* (1992) 10 Cal.App.4th 908, 922.

18 **B. The Court’s Lead Agency Determination Here Should Further the Purposes**  
19 **of CEQA by Designating the Agency That Is in the “Best Position” to**  
20 **Implement CEQA’s Underlying Purpose of Analyzing and Disclosing the**  
21 **Proposed Project’s Environmental Effects.**

22 Section 21067 of CEQA defines the lead agency as the public agency that has “the  
23 principal responsibility for carrying out or approving a project....” Where “two or more public  
24 agencies will be involved with a project,” the CEQA Guidelines provide additional criteria for  
25 determining which agency shall be the lead agency. For private development projects approved  
26 by a public agency, the lead agency “shall be the public agency with the greatest responsibility  
27 for supervising or approving the project as a whole,” for example, an agency with “general  
28

<sup>12</sup> To help ensure that the environmental document used by responsible agencies “will comply with CEQA,” section 15096(d) and (f) instructs all responsible agencies to review and comment on the lead agency’s draft EIR, focusing on “any shortcomings in the EIR.” The Discussion following that section explains that CEQA’s general rule is that other agencies will not themselves prepare EIRs, because “*they must use the document prepared by the Lead Agency.*”

1 governmental powers” would normally be the lead agency, rather than a “limited purpose”  
2 agency. CEQA Guidelines § 15051(b). Where more than one agency equally meet these  
3 criteria, the agency that “will act first on the project” shall be the lead agency. CEQA  
4 Guidelines § 15051(c).

5 California’s appellate courts have amplified CEQA’s lead agency designation criterion.  
6 The lead agency should normally be the agency that is in the “*best position*” to further CEQA’s  
7 ... “*underlying purpose*” of “*analyz[ing] and inform[ing] the public regarding a project’s*  
8 *potential adverse effects to the environment as a whole.*” See, e.g., *City of Sacramento v. State*  
9 *Water Resources Control Board* (1991) 2 Cal.App.4th 960, 973; *Planning and Conservation*  
10 *League, supra*, at 907.

11 In *City of Sacramento*, the Court first observed that “[b]efore examining the roles of the  
12 various agencies involved in the project here, it is necessary to understand the scope of that  
13 project.” *City of Sacramento* at 971. Once it determined that, in the matter before it, “the  
14 entire process is the project,” the Court ruled that the Department of Food and Agriculture  
15 (DFA) should have been the lead agency for preparing the environmental documentation for  
16 annual rice pesticide plans, in large part because DFA was in the “best position” during the  
17 formulation, approval and implementation of those plans to assess their potential environmental  
18 impacts. *Id.* at 973.

19 Similarly, in *Planning and Conservation League*, the Court ruled that, in making a lead  
20 agency designation, courts must determine, as a matter of law without deferential review,  
21 which agency most appropriately serves as lead agency, given the nature and scope of the  
22 project involved. After determining that the project at issue there was implementation of the  
23 Monterey Agreement (a statement of water allocation and management principles) into long-  
24 term contracts between the Department of Water Resources (DWR) and the local water  
25 contractors, the Court concluded that the DWR, rather than an association of local water  
26 contractors, should have been the CEQA lead agency. The Court based this ruling in part on  
27 DWR’s greater familiarity with the environmental problems and issues relating to different  
28

1 potential water allocation schemes. *Planning and Conservation League, supra.* at 906-07.<sup>13</sup>

2 A key factor in this Court's determination of the most suitable CEQA lead agency here  
3 thus involves ascertaining the appropriate scope of the CEQA "project." In this regard, the  
4 CEQA Guidelines explicitly establish that the "project" should be defined in a manner that  
5 encourages comprehensive environmental analysis and that discourages "piece-mealing."  
6 Thus, section 15378 expressly defines the term "project" to mean "the *whole of an action*,  
7 which has the potential for resulting in either a direct physical change in the environment or a  
8 reasonably foreseeable indirect physical change in the environment." Similarly, section  
9 15378(c) explicitly cautions that the term "project" "*does not mean each separate*  
10 *governmental approval.*" Rather, it "refers to the activity which is being approved" and "*which*  
11 *may be subject to several discretionary approvals by governmental agencies.*" Notably, when  
12 public agencies, from time to time, have sought to "piecemeal" CEQA environmental review  
13 by improperly segmenting a "project," California's courts have routinely upheld the  
14 fundamental CEQA principles requiring comprehensive environmental review.<sup>14</sup>

15 Significantly, the CEQA Guidelines include a specific provision regarding project  
16 definition that is explicitly designed to implement the lead agency principle and that closely  
17 applies the instant fact situation. As with the *City of Sacramento* and *Planning and*  
18 *Conservation League* decisions, this provision reveals the intertwined nature of the  
19 determination of the CEQA lead agency and the determination of the appropriate CEQA  
20 "project." The provision in question, section 15378(d), instructs agencies that are trying to  
21 determine how to define a CEQA "project" that, when they could define the project *either as*  
22

23 <sup>13</sup> See also *Friends of Cuyamaca Valley v. Lake Cuyamaca Recreation and Park Dist.* (1994) 28 Cal.App.4th 419  
24 (Department of Fish and Game, not special district managing lake, should have been lead agency in establishing  
25 duck hunting season at lake, in part because Department holds ownership interest in lake).

26 <sup>14</sup> For example, in *Citizens for Sensible Dev. of Bishop v. County of Inyo* (1985) 172 Cal.App.3d 151, the  
27 underlying development project was a proposed shopping center in the Bishop unincorporated area. The County  
28 first prepared a negative declaration, defining the general plan and zoning as the "project" in question, and  
concluding that important environmental decisions about the proposed development could be better evaluated in a  
later-prepared environmental document. The County then prepared a second negative declaration, defining the use  
permit and subdivision map approval as the project, and concluding that most key environmental decisions had  
already been made when the planning and zoning were previously acted upon. By segmenting the various  
governmental approvals as "projects" that were separate from the underlying development project and analyzing  
those particular governmental approvals seriatim, the agency had given the decision-makers a distorted and  
incomplete environmental evaluation of the project.



1 merely implementing their broad planning and zoning responsibilities *or* as “a development  
2 proposal which will be subject to several governmental approvals,” the agency “*shall describe*  
3 *the project as the development proposal* for purposes of environmental analysis.” The  
4 Discussion following this section further clarifies that, when “*a specific development project*”  
5 constitutes the underlying action, none of the various future potential actions related to that  
6 development project, such as a general plan amendment, should be segmented from the  
7 underlying development proposal. Rather, any such future governmental actions should simply  
8 be “characterize[d]” as part of the basic underlying development project. The CEQA  
9 Guidelines specify that this project definition provision implements the lead agency concept, so  
10 that there will be “*only one EIR being prepared for the proposed development.*” See  
11 Discussion following Section 15378.

12 In the instant case, in accord with the provisions of section 15378, Santa Clarita never  
13 should have attempted to segment a few government approvals away from the underlying  
14 development project and proclaimed that its proposed actions on those limited approvals would  
15 properly be the subject of a separate environmental document. Rather, Santa Clarita’s  
16 proposed approvals involved one of several alternative site development scenarios that should  
17 have been evaluated within a single, comprehensive EIR – just as Santa Clarita had initially  
18 demanded that the Los Angeles-prepared EIR should undertake. By segmenting its proposed  
19 actions away from the basic underlying development project, Santa Clarita’s improper  
20 preparation of a rival environmental document has resulted in a completely uninformative ND  
21 that failed to evaluate or describe the potential environmental impacts of, and mitigation  
22 measures for, future development potentially resulting from Santa Clarita’s own zoning  
23 standards. Rather, as discussed above, Santa Clarita’s ND simply described why it would  
24 either postpone environmental review to some future time after the LAFCo has acted, or why it  
25 supposedly had already undertaken the necessary environmental review some dozen years  
26 earlier.

27 Most importantly, this Court’s designation of Los Angeles as the sole lead agency for  
28 preparing the environmental documents associated with the underlying Las Lomas

1 development project and all related government approvals – including any needed approvals to  
2 build out an alternative development scenario pursuant to Santa Clarita’s zoning standards and  
3 controls – would substantially further CEQA’s basic purposes. Unlike Santa Clarita’s narrow  
4 view, where, at most, its environmental document purported to evaluate a single development  
5 alternative (and even then its ND failed to do so), the Los Angeles-prepared full EIR will  
6 evaluate a range of development scenarios, including development pursuant to Santa Clarita’s  
7 pre-zoning standards. Further, Los Angeles, as lead agency, will provide an evaluation of the  
8 environmental factors that the LAFCo must take into account when it decides how to act on the  
9 rival annexation applications. Additionally in preparing its full EIR, Los Angeles has access to  
10 the financial resources, information and expertise of the project applicant, Las Lomas, which,  
11 to date, has been cooperatively working with Los Angeles to prepare a draft EIR that  
12 comprehensively covers these matters. Last, all other agencies, including Santa Clarita and the  
13 LAFCo, will be able to comment upon the ensuing draft EIR and to work with Los Angeles in  
14 order to obtain a legally adequate environmental evaluation of these matters. This is precisely  
15 where the CEQA process started more than a year ago, before Santa Clarita belatedly decided  
16 to usurp Los Angeles’ lead agency authority.

17 Because the lead agency designation can be crucial to obtaining an adequate and  
18 comprehensive environmental review, section 21165 of CEQA establishes an expedited 21-day  
19 process for administrative resolution of lead agency disputes. This alternative process is  
20 parallel to any court jurisdiction, and, under certain circumstances, allows the Governor’s  
21 Office of Planning and Research (OPR) to designate a lead agency. In an effort to obtain a  
22 prompt lead agency designation, on August 14th, Las Lomas requested OPR to assume  
23 administrative jurisdiction and to designate Los Angeles as the lead agency for all matters  
24 relating to development of the Las Lomas site. See Petitioner’s Request for Judicial Notice  
25 (RJN) at 3. OPR, however, declined jurisdiction to do so, indicating in its September 10, 2003  
26 letter that the type of lead agency “dispute” at issue here does not fall within its expedited 21-  
27 day administrative process. RJN at 6. OPR’s earlier September 2, 2003 letter had revealed that  
28 the 21-day period was not sufficient time to allow OPR to consider the issues, because that

1 earlier letter set forth two patently erroneous statements about the matter before it that made no  
2 sense. When counsel for Las Lomas brought this to OPR staff's attention, they readily  
3 admitted the factual and legal errors and determined to issue a subsequent letter. RJN at 5-6.  
4 In declining jurisdiction, the subsequent September 10<sup>th</sup> letter states simply that there is no  
5 jurisdictional "dispute" and that the statements in its earlier letter should not be construed in  
6 any manner as findings or as comments about the merits of the parties' arguments. RJN at 6.  
7 These matters are further described in the RJN at 1-6. The ultimate outcome, of course, is that  
8 the lead agency issues are ripe for this Court's adjudication.

9 **IV. UNDER EQUITABLE ESTOPPEL PRINCIPLES, SANTA CLARITA SHOULD**  
10 **BE STAYED FROM PROCESSING ITS ANNEXATION APPLICATION AT**  
11 **THE LAFCO UNTIL LAS LOMAS' ANNEXATION PETITION CAN BE**  
12 **CONCURRENTLY PROCESSED BY THE LAFCO.**

13 Estoppel is required when: (1) the party to be estopped has been apprised of the facts;  
14 (2) that party intends that its conduct be acted upon, such that the party asserting estoppel is  
15 left ignorant of the true state of facts; and (3) the party asserting estoppel relies on the conduct  
16 to its injury. *City of Long Beach v. Mansell* (1970) 3 Cal.3d 462, 488-89.

17 All the criteria for estoppel have been met here. First, from the start, Santa Clarita has  
18 unquestionably known that Los Angeles has assumed the role of lead agency and has begun  
19 preparing a full EIR in connection with Las Lomas' development project, including its petition  
20 to annex the proposed development site to Los Angeles. The June 2002 NOP expressly  
21 announced this fact. 9-AR 2855.

22 Second, Santa Clarita's August 2002 Comments acknowledged Los Angeles' role as  
23 lead agency and specifically demanded that Los Angeles broaden its environmental review of  
24 development at the Las Lomas site to include a review of alternative development scenarios,  
25 including evaluation of the environmental impacts of, and appropriate mitigation measures for,  
26 development of the site pursuant to Santa Clarita's current planning and zoning standards.  
27 Santa Clarita's comments also demanded that Los Angeles' EIR study the various  
28 environmental factors that LAFCo would need to evaluate in deciding whether to approve  
annexation to an adjacent municipality. 9-AR 2991-2992. Santa Clarita thus necessitated that  
both Las Lomas and Los Angeles invest even more money and precious time in those tasks.

1 When, over six months later, Santa Clarita approved its pre-zoning and annexation application,  
2 its ND provided essentially zero information about the environmental impacts of, or mitigation  
3 measures necessary for, site development pursuant to Santa Clarita's pre-zoning. To the  
4 contrary, its rogue environmental document related merely that Santa Clarita had concluded  
5 that its proposed pre-zoning and annexation actions did not constitute a "project" under CEQA  
6 and thus required no environmental review; that, at present, Santa Clarita maintained that  
7 environmental review of the potential impacts of its proposed actions was premature and  
8 should appropriately be deferred to a future time after LAFCo acts on Santa Clarita's proposed  
9 annexation; and that, despite the numerous explicitly acknowledged environmental problems  
10 with development of the site, Santa Clarita would defer to a future time consideration of any  
11 mitigation measures for both site specific impacts and non-site specific impacts. 12-AR 3657-  
12 3661. Thus, while demanding that Los Angeles spend the time and resources to study potential  
13 development of the site under Santa Clarita's pre-zoning density standards, Santa Clarita's so-  
14 called ND undertook no environmental review of these matters, leaving to Los Angeles the  
15 time-consuming responsibility for environmental review of Santa Clarita's pre-zoning action.

16 Third, both Los Angeles and Plaintiff Las Lomas have relied on Santa Clarita's conduct  
17 to their injury. Both have spent considerable amounts of time and money in preparing the  
18 environmental document and in processing the governmental entitlements for the project. For  
19 example, Las Lomas has submitted to Los Angeles a "screen check" draft EIR and traffic  
20 study, and the pertinent Los Angeles agencies and departments have proceeded with their  
21 internal review and analysis of that document. Las Lomas also has submitted to Los Angeles a  
22 draft Specific Plan for the proposed development project, and it has worked closely with  
23 LADWP to prepare and submit to the City's Planning Department an approved Water Supply  
24 Availability Assessment for the project. See Lee Wagman Declaration.

25 Estoppel is properly applied against governmental entities, including cities such as Santa  
26 Clarita, except in the rare instance where doing so would nullify a strong rule of policy adopted  
27 for the benefit of the public. *City of Long Beach, supra*, at 493-97. In this case, there is no strong  
28 rule of public policy promoted by Santa Clarita's actions here. In fact, Santa Clarita's attempt to


1 circumvent environmental review of its own proposed pre-zoning action – in order to advance its  
2 annexation application ahead of Las Lomas’ rival proposal to annex to Los Angeles – while  
3 concurrently demanding Los Angeles’ environmental review of that same proposed action,  
4 subverts CEQA’s fundamental public policy of providing the “fullest possible” environmental  
5 protection. *See, e.g., Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247, 259,  
6 262. Beyond this, in deciding whether to approve Santa Clarita’s application, the LAFCo would  
7 be required, without this action and this Court’s order, to “conclusively presume” that Santa  
8 Clarita’s environmental document is legally adequate, even though it lacks the needed  
9 environmental review, including analysis of the environmental factors that LAFCo must consider  
10 in evaluating annexation proposals. If, as a result, LAFCo were to act favorably on Santa  
11 Clarita’s annexation application before considering Las Lomas’ application to annex to Los  
12 Angeles, then Los Angeles and Las Lomas would have futilely expended their resources for no  
13 reason except to satisfy Santa Clarita’s delaying tactic demands.

14 Throughout, Plaintiff Las Lomas and Los Angeles have been doing just what CEQA is  
15 designed to promote: making a comprehensive evaluation of the potential environmental impacts  
16 of, and the appropriate mitigation for, planned development of the site (including development  
17 pursuant to Santa Clarita’s own pre-zoning standards). To allow Santa Clarita to advance its  
18 annexation to the “front of the line” in this inequitable manner would undermine the very heart of  
19 CEQA. The Court should, at minimum, order that Santa Clarita cannot process its annexation  
20 application at the LAFCo until the Las Lomas annexation petition and accompanying Los  
21 Angeles-prepared environmental document can be concurrently processed by the LAFCo.

## 22 CONCLUSION

23 For the reasons set forth above, the requested relief should be granted.  
24 Dated: September 11, 2003

Respectfully Submitted,  
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 2029 Century Park East, #2400, Los Angeles, California 90067. On **September 11, 2003**, I served the foregoing document(s) described as: **PETITIONER'S OPENING BRIEF** on interested parties in this action by placing ☐ the original ☒ true copy(ies) thereof enclosed in sealed envelopes ☐ as follows: ☒ as stated on the attached mailing list:

[SEE ATTACHED SERVICE LIST]

☒ BY MAIL (C.C.P. § 1013(a)) I am readily familiar with the firm's practice of collection and processing correspondence for mailing with the U.S. postal service. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. The envelope was sealed and placed for collection and mailing on that date following ordinary business practices.

☐ BY PERSONAL SERVICE (C.C.P. 1011(a); Los Angeles County Local Rule 9.8(d)) I delivered such envelope(s) by hand to the offices of the addressee(s).

☒ (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **September 11, 2003** at Los Angeles, California.

Sharon Thomas Cash

[Print Name Of Person Executing Proof]

  
[Signature]

SERVICE LIST

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Office of the City Attorney  
200 North Main Street, Suite 700 CHE  
Los Angeles, California 90012

**THE FOLLOWING PARTIES  
WERE SERVED:**

**C/O LAS LOMAS LAND COMPANY, L.L.C.  
233 WILSHIRE BLVD., SUITE 800  
SANTA MONICA, CALIFORNIA 90401**

THE ESTATE OF RALPH FLORA  
Samuel R. Biggs, Trustee  
2800 28<sup>th</sup> Street, Suite 300  
Santa Monica, California 90405

NEWHALL CALGROVE ESTATES, L.P.  
Ghislane Brassine  
5327 Penfield Avenue  
Woodland Hills, California 91364

Janet McHaddad  
14102 Tiara Street  
Van Nuys, California 91401

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Carole Bergin  
5216 Corteen Place, #17  
Valley Village, California 91607

Frederick Bergin  
5216 Corteen Place, #17  
Valley Village, California 91607

4412.

|           |                                                                |        |           |
|-----------|----------------------------------------------------------------|--------|-----------|
| CASE:     | <u>Las Lomas Land Co. LLC v. City of Santa Clarita, et al.</u> |        |           |
|           | RPIs: City of LA, et al.                                       |        |           |
| CASE No.: | BS082219                                                       |        |           |
| DATE:     | Tuesday, April 13, 2004                                        | TIME:  | 9:30 a.m. |
| JUDGE:    | Dzintra Janavs                                                 | DEPT.: | 85        |
| EVENT:    | Hearing on Petition for Writ of Mandate                        |        |           |
|           | Hearing on City's Motion to Amend Answer                       |        |           |

Petitioner Las Lomas challenges Respondent City of Santa Clarita's adoption of a Negative Declaration for its pre-zoning of approximately 825 acres of unincorporated territory directly south of Santa Clarita and northwest of Los Angeles and proposed annexation of the land to Santa Clarita (the "City"). (12 AR 3647-3711.) The land would be pre-zoned Residential Estate (811 acres) and Residential Moderate (14 acres). (12 AR 3648.) Petitioner holds options to buy approximately 555 acres of the land and is seeking annexation of it to Los Angeles. Petitioner proposes to develop the land with a mixed-use project of dwelling units, retail, a hotel, community facilities, and open space (the "Las Lomas Proposal"). (9 AR 2738.)

On 5/28/02, Petitioner filed an Environmental Assessment Form with the City of Los Angeles to initiate review of the Las Lomas Proposal. (9 AR 2738.) On 6/18/02, Petitioner submitted to LAFCO an application for the Las Lomas Proposal (9 AR 2761-2851), but the application was twice rejected for lack of appropriate CEQA documentation and remains incomplete. (9 AR 3001, 3047; 10 AR 3224-3228.) On 7/27/02, LA issued a Notice of Preparation (NOP) announcing its intent to prepare an EIR for the Las Lomas Proposal. (9 AR 2853-2855.) The City made extensive comments to the NOP. (9 AR 2985-2999.) Petitioner, in consultation with Los Angeles, began preparing the EIR and submitted a draft Specific Plan for its Proposal. (9/10/03 Wagman Decl.)

On 12/11/02, pursuant to City Council resolution (10 AR 3166), the City submitted an application to LAFCO for its own proposed pre-zoning and annexation of the area (10 AR 3179-3193), which was also rejected as incomplete. (10 AR 3194.) On 2/4/03, the City issued a Negative Declaration and Initial Study concluding that the proposed actions did not constitute a project under CEQA, but nevertheless conducting CEQA review and concluding the pre-zoning and annexation actions "could not have a significant effect on the environment." (12 AR 3647-3711.) On 2/27/03, the City issued a Notice of Determination for the Negative Declaration. (12 AR 3863.)

On 4/1/03, Petitioner filed this action seeking a writ of mandate commanding the City to set aside its Negative Declaration and LAFCO to stay its proceedings re the annexation area until the EIR for the Las Lomas Proposal is complete so that LAFCO can process Petitioner's and the City's proposals concurrently.1

**Standing:**

Any member of the public, including nearby residents and/or property owners, has a beneficial interest in CEQA compliance and thus has standing under CEQA to challenge proposed annexation actions.

The City's unopposed Motion to Amend its Answer is granted, although it may be unnecessary, as LAFCO alleged a standing defense in its answer, and the City's answer included a defense of "reliance upon defenses alleged by other parties." (Answers, Exs. A-B to P's response to Motion.)



Bozung v. Ventura County LAFCO (1975) 13 Cal.3d 263, 272. While economic interest alone does not confer standing, it does not negate standing when the requirements for standing are otherwise met. See, e.g., Waste Management of Alameda County, Inc. v. County of Alameda (2000) 79 Cal.App.4<sup>th</sup> 1223; Burrtec Waste Industries, Inc. v. City of Colton (2002) 97 Cal.App.4<sup>th</sup> 1133.

Here, Petitioner owns options on the property the City proposes to pre-zone and annex and thus has standing to bring this action.

#### **Standards of review under CEQA:**

To establish a CEQA violation, Ps must establish an abuse of discretion, which can be shown if (1) the City failed to proceed in the manner required by law, (2) the decision is not supported by the findings, or (3) the findings are not supported by substantial evidence. CCP 1094.5, Pub. Res. Code §§ 21168, 21168.5. Petitioner contends that the City abused its discretion by adopting the negative declaration rather than preparing an EIR.

If substantial evidence in the record supports a fair argument that significant environmental impacts may result from a project, an EIR is required. Quail Botanical Gardens Foundation, Inc. v. City of Encinitas (1994) 29 Cal.App.4<sup>th</sup> 1597, 1602. If substantial evidence supports a fair argument for significant environmental impacts, adoption of a negative declaration cannot be upheld merely because there may be substantial evidence that the project would not cause such impacts. Friends of "B" Street v. City of Hayward (1980) 106 Cal.App.3d 988, 1002. Substantial evidence is:

[E]nough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that the project may have a significant effect on the environment is to be determined by examining the whole record before the lead agency... CEQA Guidelines § 15384(a).

Questions of law are reviewed de novo. California School Employees Association v. DMV (1988) 203 Cal.App.3d 634, 644.

#### **The pre-zoning and annexation actions are a project under CEQA, and an EIR is required.**

A project under CEQA includes "the enactment and amendment of zoning ordinances." PRC § 21080(a). Zoning changes are projects under CEQA even where no specific development has been submitted to the agency by a property owner. City of Carmel-by-the-Sea v. Board of Supervisors (1986) 183 Cal.App.3d 229, 241-244 (holding that re-drawing of a zoning boundary near a wetland to implement the General Plan is a project under CEQA requiring an EIR). The pre-zoning at issue here constitutes enactment or amendment of a zoning ordinance.

Annexation is also a project for CEQA purposes.<sup>2</sup> Bozung v. Ventura County LAFCO (1975) 13 Cal.3d 263, 279; Pistoresi v. City of Madera (1982) 138 Cal.App.3d 284.

The City's proposed pre-zoning and annexation is a project for purposes of CEQA, and environmental review was required.

---

<sup>2</sup> Contrary to the City's arguments, this is a separate question from what level of CEQA review is required and is true regardless of whether the annexation will foreseeably result in development.

Petitioner contends that an EIR rather than a Negative Declaration is required for the City's pre-zoning and annexation actions because they will ultimately have environmental impacts that must be analyzed now, before they are approved and irrevocably put into place.

The record contains substantial evidence to support a fair argument that the City's actions may have significant environmental impacts. As stated by the City in its own resolution regarding the Los Angeles/Las Lomas proposed project NOP, "any development in the Las Lomas project area will have a significant environmental impact..." (10 AR 3172.) According to the City's comments to the Las Lomas Proposal, development could result in impacts to the Significant Ecological Area and its wildlife corridor resources, cultural resources, and wetlands, and could result in geological problems created by the area's steep slopes, nearby earthquake fault lines, and wildland fire hazard characteristics. (9 AR 2985-2999.) The City specifically asked Los Angeles to evaluate such impacts, which are also described and acknowledged in the City's GP and the Negative Declaration itself. (*Id.*) An internal City memorandum listing its "concerns with the Las Lomas project" indicates that the City should be the entity to annex the area, as it "will receive at least 75 percent of the project impacts in regards to drainage, air quality, water supply, schools, etc." (10 AR 3257.) Further evidence of environmental impacts was provided to the City by Petitioner in its comments to the Negative Declaration. (11 AR 3433-3438.)

This case is analogous to other cases in which an EIR has been required. In Bozung, *supra*, the court held that an EIR was required for the approval of an annexation because, even though it would not have a direct effect on the environment, the annexation would likely lead to significant environmental impacts. *Id.* at 281. The court noted the annexation application was made as a direct result of a landowner's desire to develop the annexed area, so development of the land in the future was anticipated. *Id.* In such circumstances, "it is desirable that the precise information concerning environmental consequences which an EIR affords be furnished and considered at the earliest possible stage." *Id.* at 282. See also Pistoresi (holding that a Negative Declaration for proposed annexation was insufficient).

As the City acknowledges, the cases hold that CEQA review of annexation is required where future development of the land is reasonably foreseeable. Here future development is reasonably foreseeable, as Petitioner has stated that it intends to propose development to the City if the land is ultimately annexed to it rather than to Los Angeles. (12 AR 3846, 3752.) In addition, the annexation and pre-zoning authorize up to 282 new residential units on the land. The City's argument that Petitioner will be unable to comply with its planned low-density zoning (12 AR 3656) is speculative, and even if Petitioner does not develop the land, it is reasonably foreseeable that some development will occur once the area is pre-zoned and annexed.<sup>3</sup> The City's view that no development is foreseeable is not supported by the evidence.<sup>4</sup>

#### **Violations of public notice and review requirements.**

---

<sup>3</sup> A similar argument was rejected by the court in Pistoresi, which found that, regardless of the planned use or zoning designation, "annexation into the city will result in accelerated conversion of the property into residential uses" as compared to the current use of the land at issue. Here, even if Petitioner's planned zoning would result in lower-density development, the pre-zoning and annexation would undoubtedly result in more development than exists currently.

<sup>4</sup> It may be noted the Negative Declaration here is deficient in that it improperly incorporates outdated analysis from 1991 General Plan regarding non-site-specific environmental impacts (e.g., population, jobs/housing, balance, etc.). Here, substantial evidence supports a fair argument that since the 1991 GP EIR, cumulative non-site-specific impacts have occurred that were not analyzed in that document and were not analyzed in the Negative Declaration. (See evidence set forth at Opening Brief pp. 22-23.)

Administrative mandamus actions are subject to general civil pleading rules. CCP § 1109. A pleading must contain "a statement of the facts constituting the cause of action." CCP § 425.10. "Ordinarily the complaint delimits the nature of the legal theories which plaintiff may pursue and the nature of the evidence which is admissible." Ostling v. Loring (1994) 27 Cal.App.4<sup>th</sup> 1731, 1744. As the FAP alleges no claim based on inadequate public notice and review. Petitioner's vague and general allegations that the City violated CEQA by approving a "hastily" and "improperly prepared" Negative Declaration (FAP at 2:13, 2:20-23, 12:17) and similar allegations in its Statement of Issues are insufficient.

As the City's alleged violations of public notice and review requirements are not plead in the First Amended Petition (FAP), they are not properly before the Court.

#### **Timing of the processing of LAFCO applications and proper lead agency.**

LAFCO is vested with discretion to determine the priority of its proceedings where pending proceedings are conflicting. Gov. Code § 56655. Here, LAFCO does not have any pending proposals before it, as LAFCO has not issued a certificate of filing for either the City's or LA's proposal. Gov. Code § 56651 (no proceeding initiated until issuance of certificate of filing). While the City's application is arguably complete, except for this Court's determination on the sufficiency of its CEQA documentation, a tax transfer resolution must be adopted by the affected agencies before a certificate of filing can be issued. Rev. & Tax. Code § 99(b).

Since neither proposal is pending, LAFCO has made no decision re priority. When and if one or more proposals are pending, LAFCO is entitled to exercise its statutory discretion in determining priority. There is no basis now for determining priority or for commanding LAFCO to exercise its discretion in a given way (i.e., by committing to concurrent review). There is no priority decision by LAFCO for this Court to review.

Petitioner's argument that LA should serve as the lead agency for the City's proposal is without merit. LAFCO is required to rely on the environmental document prepared by the lead agency. PRC §§ 21165-21166; Guidelines § 15096. The lead agency is "the public agency which has the principal responsibility for carrying out of approving a project which may have a significant effect upon the environment." PRC § 21067. The Guidelines specifically state that in the case of an annexation proposal, the annexing city is the appropriate lead agency and is responsible for preparing the environmental document at the time of pre-zoning, and that LAFCO serves as a responsible agency. Guidelines § 15051. Therefore, it is impossible to determine which city is the appropriate lead agency until LAFCO makes a determination on the annexation proposals.

The Petition for Writ of Mandate is granted as to the City. A writ shall issue commanding Respondent City of Santa Clarita to set aside its Negative Declaration for the proposed pre-zoning and annexation and to prepare an EIR for the project. The Petition for Writ of Mandate is denied as to LAFCO.

COPY

ORIGINAL FILED

MAY 03 2004

LOS ANGELES  
SUPERIOR COURT

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

LAS LOMAS LAND COMPANY, L.L.C.,

Petitioner and Plaintiff,

vs.

CITY OF SANTA CLARITA and LOCAL  
AGENCY FORMATION COMMISSION FOR  
LOS ANGELES COUNTY,

Respondents and Defendants,

CITY OF LOS ANGELES; CAROLE AND  
FREDERICK BERGIN; THE ESTATE OF  
RALPH FLORA; NEWHALL CALGROVE  
ESTATES, L.P., R. FRED and JANET  
MCHADDAD; and Does 1 through 50,

Real Parties in Interest.

Case No. BS 082219

[Assigned To The Honorable Dzintra Janavs For  
All Purposes]

Date: April 13, 2004

Time: 9:30 A.M.

Dept.: 85

~~[REVISED PROPOSED]~~ JUDGMENT  
GRANTING PEREMPTORY WRIT OF  
MANDATE

1  
2 This matter came on regularly for hearing on the verified First Amended Petition for Writ of  
3 Mandate on April 13, 2004 at 9:30 a.m. in Department 85 of the above-entitled Court, the Honorable  
4 Dzintra Janavs, Judge presiding. Attorneys Carlyle W. Hall, Jr. and Joyce W. Wong appeared on behalf of  
5 Petitioner/Plaintiff Las Lomas Land Company, L.L.C. ("Las Lomas"); Cheryl J. Kane appeared on behalf  
6 of Respondent/Defendant City of Santa Clarita ("Santa Clarita"); Thomas J. Faughnan appeared on behalf  
7 of Respondent/Defendant Local Agency Formation Commission for Los Angeles County ("LAFCo"); and  
8 Jack L. Brown appeared on behalf of Real Party in Interest City of Los Angeles ("Los Angeles").

9 After the Court's full consideration and review of the administrative record, the parties' briefs and  
10 counsels' oral arguments; the matter having been submitted for decision; and the Court having issued a  
11 tentative decision, which was deemed and filed as the Court's Statement of Decision on April 13, 2004,

12 IT IS ORDERED, ADJUDGED AND DECREED that:

13 1. On the first cause of action for writ of mandate under the California Environmental  
14 Quality Act ("CEQA"), which Petitioner/Plaintiff Las Lomas asserted against both  
15 Respondents/Defendants Santa Clarita and LAFCo, judgment be entered:

- 16 • in favor of Petitioner/Plaintiff Las Lomas against Respondent/Defendant Santa Clarita, and  
17 • against Petitioner/Plaintiff Las Lomas in favor of Respondent/Defendant LAFCo.

18 2. A peremptory writ of mandate shall issue from the Clerk of the Court mandating  
19 Respondent/Defendant Santa Clarita to set aside its February 25, 2003 decisions adopting the negative  
20 declaration for and approving the South Santa Clarita pre-zoning and annexation actions (Master Case  
21 02-474 - Pre-zone 02-004 and Annexation 02-004) (the "Project"), and thereafter, in any subsequent  
22 processing of the Project, to prepare an environmental impact report in full compliance with CEQA  
23 and in accordance with the Court's April 13, 2004 Statement of Decision.

24 2. On the second cause of action for equitable estoppel, which Petitioner/Plaintiff Las  
25 Lomas asserted against Respondent/Defendant Santa Clarita, judgment be entered against  
26 Petitioner/Plaintiff Las Lomas in favor of Respondent/Defendant Santa Clarita.

1           3.    On the third cause of action for declaratory relief, which Petitioner/Plaintiff Las Lomas  
2 asserted against Respondent/Defendant Santa Clarita, judgment need not be made because the issue  
3 has been rendered moot by the Court's ruling on the second cause of action.

4           4.    On the fourth cause of action for injunctive relief, which Petitioner/Plaintiff Las Lomas  
5 asserted against both Respondents/Defendants Santa Clarita and LAFCo:

- 6       • judgment need not be made as between Petitioner/Plaintiff Las Lomas and  
7 Respondent/Defendant Santa Clarita, because the issue has been rendered moot by the Court's  
8 ruling on the first cause of action, and
- 9       • judgment be entered against Petitioner/Plaintiff Las Lomas in favor of Respondent/Defendant  
10 LAFCo.

11          5.    Petitioner/Plaintiff Las Lomas shall be awarded its costs of the suit in the amount of  
12 \_\_\_\_\_ as against Respondent/Defendant Santa Clarita.


13          6.    The Court reserves jurisdiction to determine, upon motion by Petitioner/Plaintiff Las  
14 Lomas, whether to award reasonable attorneys' fees and other costs of suit to Petitioners pursuant to  
15 Code of Civil Procedure, section 1021.5, the private attorney general doctrine.

16          7.    The Court reserves jurisdiction to determine, by return to the peremptory writ of  
17 mandate, whether Respondent/Defendant Santa Clarita has undertaken those actions necessary to  
18 comply with the Court's writ and with CEQA.

19 APPROVED AS TO FORM:

20 Dated: 4/27/04

AKIN GUMP STRAUSS HAUER & FELD LLP

21   
22 Carlyle W. Hall, Jr.  
23 Attorneys for Petitioner and Plaintiff Las Lomas  
24 Land Company, L.L.C.

25 Dated: \_\_\_\_\_

CARL K. NEWTON, City Attorney  
BURKE, WILLIAMS & SORENSEN, LLP

26 \_\_\_\_\_  
27 Cheryl J. Kane  
28 Attorneys for Respondent and Defendant City of  
Santa Clarita

1           3.     On the third cause of action for declaratory relief, which Petitioner/Plaintiff Las Lomas  
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4           4.     On the fourth cause of action for injunctive relief, which Petitioner/Plaintiff Las Lomas  
5 asserted against both Respondents/Defendants Santa Clarita and LAFCo:

- 6       • judgment need not be made as between Petitioner/Plaintiff Las Lomas and  
7       Respondent/Defendant Santa Clarita, because the issue has been rendered moot by the Court's  
8       ruling on the first cause of action, and
- 9       • judgment be entered against Petitioner/Plaintiff Las Lomas in favor of Respondent/Defendant  
10      LAFCo.

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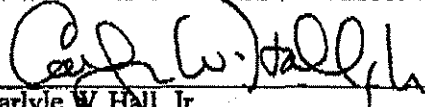
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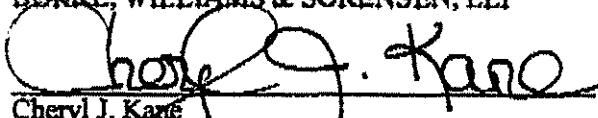
20 Dated: 4/27/04

AKIN GUMP STRAUSS HAUER & FELD LLP

  
21  
22 Carlyle W. Hall, Jr.  
23 Attorneys for Petitioner and Plaintiff Las Lomas  
Land Company, L.L.C.

24 Dated: April 29, 2004

CARL K. NEWTON, City Attorney  
BURKE, WILLIAMS & SORESENSEN, LLP

  
26  
27 Cheryl J. Kane  
28 Attorneys for Respondent and Defendant City of  
Santa Clarita

Dated: \_\_\_\_\_

COUNTY COUNSEL

\_\_\_\_\_  
Thomas J. Faughnan  
Attorneys for Respondent and Defendant Local  
Agency Formation Commission for Los Angeles  
County

Dated: 4/29/04

ROCKY DELGADILLO, City Attorney

*For* *Michael Glynn*  
Jack L. Brown  
Attorneys for Real Party in Interest City of Los  
Angeles


Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Dzintra Janavs  
Judge of the Superior Court



1 Dated: 4/28/04

COUNTY COUNSEL

  
Thomas J. Faughnan  
Attorneys for Respondent and Defendant Local  
Agency Formation Commission for Los Angeles  
County

2  
3  
4  
5  
6 Dated: \_\_\_\_\_

ROCKY DELGADILLO, City Attorney

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28  
Jack L. Brown  
Attorneys for Real Party in Interest City of Los  
Angeles

Dated: \_\_\_\_\_

MAY 03 2004

**DZINTRA I. JANAUS**

The Honorable Dzintra Janavs  
Judge of the Superior Court

ctclip

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

LAS LOMAS LAND COMPANY, L.L.C.,

Petitioner and Plaintiff,

vs.

CITY OF SANTA CLARITA and LOCAL  
AGENCY FORMATION COMMISSION FOR  
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Respondents and Defendants,

CITY OF LOS ANGELES; CAROLE AND  
FREDERICK BERGIN; THE ESTATE OF  
RALPH FLORA; NEWHALL CALGROVE  
ESTATES, L.P., R. FRED and JANET  
MCHADDAD; and Does 1 through 50,

Real Parties in Interest.

Case No. BS 082219

[Assigned To The Honorable Dzintra Janavs For  
All Purposes]

Date: April 13, 2004

Time: 9:30 A.M.

Dept.: 85

**[PROPOSED] PEREMPTORY WRIT OF  
MANDATE**

**[PROPOSED] PEREMPTORY WRIT OF MANDATE**

APR 29 2004

1 TO RESPONDENT/DEFENDANT CITY OF SANTA CLARITA:

2 Judgment having been entered in this proceeding ordering that a peremptory writ of mandate be  
3 issued from this Court, and in consideration of the judgment and the Court's Statement of Decision filed on  
4 April 13, 2004,

5 IT IS HEREBY ORDERED that:

6 1. Promptly upon service of this writ, Respondent/Defendant City of Santa Clarita ("Santa  
7 Clarita") shall void and set aside its February 25, 2003 decisions adopting the negative declaration for  
8 and approving the South Santa Clarita pre-zoning and annexation actions (Master Case 02-474 - Pre-  
9 zone 02-004 and Annexation 02-004) (the "Project");


10 2. Thereafter, in any subsequent processing of the Project, Respondent/Defendant Santa  
11 Clarita shall prepare an environmental impact report in full compliance with the California  
12 Environmental Quality Act ("CEQA") and in accordance with the Court's April 13, 2004 Statement of  
13 Decision.

14 3. Pursuant to Public Resources Code section 21168.9(b), this Court retains jurisdiction  
15 over Respondent/Defendant Santa Clarita's proceedings by way of a return to this writ of mandate,  
16 until the Court has determined that Respondent/Defendant Santa Clarita has fully complied with the  
17 provisions of CEQA and the Court's April 13, 2004 Statement of Decision with respect to the  
18 commands of this peremptory writ of mandate.

19 APPROVED AS TO FORM:

20 Dated: 4/23/04

AKIN GUMP STRAUSS HAUSER & FELD LLP

21   
22 Carlyle W. Hall, Jr.  
23 Attorneys for Petitioner and Plaintiff Las Lomas  
24 Land Company, L.L.C.

25 Dated: \_\_\_\_\_

CARL K. NEWTON, City Attorney  
BURKE, WILLIAMS & SORENSEN, LLP

26  
27  
28 Cheryl J. Kane  
Attorneys for Respondent and Defendant City of  
Santa Clarita

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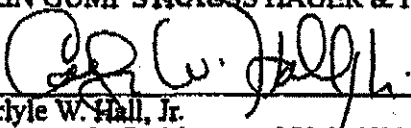
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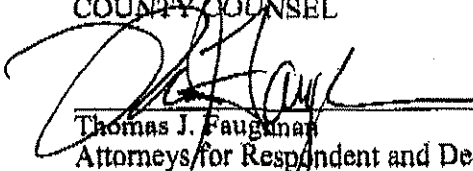
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CARL K. NEWTON, City Attorney  
BURKE, WILLIAMS & SORENSEN, LLP

25   
26 Cheryl J. Kane  
27 Attorneys for Respondent and Defendant City of  
28 Santa Clarita

1 Dated: 4/23/04

COUNTY COUNSEL

2  
3   
4 Thomas J. Pauganan  
5 Attorneys for Respondent and Defendant Local  
6 Agency Formation Commission for Los Angeles  
7 County

8 Dated: \_\_\_\_\_

ROCKY DELGADILLO, City Attorney

9   
10 Jack L. Brown  
11 Attorneys for Real Party in Interest City of Los  
12 Angeles

13 Dated: \_\_\_\_\_

CLERK OF THE SUPERIOR COURT

15  
16 \_\_\_\_\_  
17 Deputy

18 LET THE FOREGOING WRIT ISSUE, BY ORDER OF THE COURT.  
19

20 Dated: \_\_\_\_\_

21 \_\_\_\_\_  
22 The Honorable Dzintra Janavs  
23 Judge of the Superior Court  
24  
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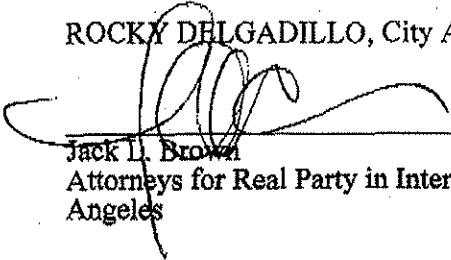
Dated: \_\_\_\_\_

COUNTY COUNSEL

Thomas J. Faughnan  
Attorneys for Respondent and Defendant Local  
Agency Formation Commission for Los Angeles  
County

Dated: 4/23/04

ROCKY DELGADILLO, City Attorney

  
Jack L. Brown  
Attorneys for Real Party in Interest City of Los  
Angeles

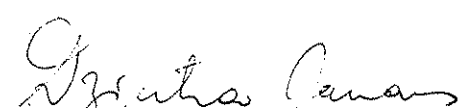
Dated: MAY 6 2004

CLERK OF THE SUPERIOR COURT  
**JOHN A. CLARKE, CLERK**

  
Deputy A. MORGAN

LET THE FOREGOING WRIT ISSUE, BY ORDER OF THE COURT.

Dated: 5/3/04

  
The Honorable Dzintra Janavs  
Judge of the Superior Court

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Las Lomas Land Company, L.L.C.  
233 Wilshire Boulevard, Suite 800  
Santa Monica, CA 90401  
310-576-0888 (fax)

**(SERVICE VIA FAX AND MAIL ONLY)**

J. MICHAEL CAREY  
City Clerk  
  
FRANK T. MARTINEZ  
Executive Officer

CITY OF LOS ANGELES  
CALIFORNIA



RICHARD J. RIORDAN  
MAYOR

Office of the  
CITY CLERK  
Council and Public Services  
Room 615, City Hall  
Los Angeles, CA 90012  
Council File Information - (213) 485-8708  
General Information - (213) 485-8705  
Fax: (213) 847-0636  
Fax: (213) 485-8944

HELEN GINSBURG  
Chief, Council and Public Services Division

When making inquiries  
relative to this matter  
refer to File No.

00-2206

NOV 16 2000

NOV 24 2000

November 16, 2000

Honorable Richard Riordan, Mayor  
Council member Bernson  
Council member Galanter  
Planning Department  
Chief Legislative Analyst

Office of Administrative  
and Research Services  
City Attorney  
Planning and Land Use Management  
Committee Clerk, Attn: J. White

RE: SUBMITTING AN APPLICATION TO THE LOCAL AGENCY FORMATION COMMISSION  
(LAFCO) FOR A SPHERE OF INFLUENCE THAT INCLUDES THE UNINCORPORATED  
PORTIONS OF THE SAN FERNANDO VALLEY

the meeting of the Council held November 14, 2000, the following  
action was taken:

Attached report adopted .....  
Attached motion (Bernson - Galanter) adopted..... X  
Attached resolution adopted ( ) .....  
Mayor concurred.....  
FORTHWITH.....  
Ordinance adopted.....  
Ordinance number.....  
Effective date.....  
Publication date.....  
Mayor vetoed.....  
Mayor approved.....  
Mayor failed to act - deemed approved.....

*J. Michael Carey*

City Clerk  
CRM

sc000\002206

|                        |                         |         |              |
|------------------------|-------------------------|---------|--------------|
| Post-it® Fax Note 7671 |                         | Date    | # of Pages 3 |
| To                     | Jim Padilla             | From    | Maria Kohnen |
| Co/Dept                | San Fernando - Planning | Co.     | City Clerk   |
| Phone #                |                         | Phone # |              |
| Fax #                  | 661 259-8125            | Fax #   | 213-978-1057 |



18

|                                                                            |     |
|----------------------------------------------------------------------------|-----|
| NOV 7 2000                                                                 |     |
| TO CITY CLERK FOR PLACEMENT ON NEXT<br>REGULAR COUNCIL AGENDA TO BE POSTED | #55 |

**MOTION**

The City of Santa Clarita recently submitted a sphere of influence application to the Local Agency Formation Commission (LAFCO) that claims portions of the San Fernando Valley. LAFCO will soon consider Santa Clarita's proposal. The City has indicated to LAFCO that the Santa Clarita sphere should not include any part of the San Fernando Valley, and that the southern boundary of the sphere should be drawn at the crest of the San Gabriel and Santa Susanna mountains.

The City of Los Angeles sphere of influence is currently coterminous with the City boundary, though large areas of the San Fernando Valley remain unincorporated. The City should apply to LAFCO for a sphere that includes these unincorporated and largely undeveloped areas.

The intent of a sphere of influence is to determine the most efficient provision of services, including police, fire, and utilities. The City of Los Angeles clearly has the greatest ability to provide these services and more to the unincorporated areas of the San Fernando Valley. Should these areas ever develop, the City would have responsibility to provide services and should have some influence over how these development decisions are made.

I THEREFORE MOVE that the City of Los Angeles submit an application to LAFCO for a Sphere of Influence that includes the unincorporated portions of the San Fernando Valley.

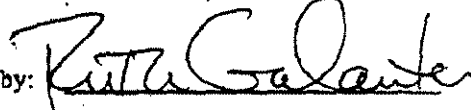
I FURTHER MOVE that the Council direct the City Planning Department with assistance from the Office of the Chief Legislative Analyst to prepare an application to LAFCO for a Sphere of Influence and report back to the Planning and Land Use Management Committee within 45 days.

Presented by:



Hal Bernson  
Councilman, 12<sup>th</sup> District

Seconded by:



ELB

**motion  
ADOPTED**

NOV 14 2000

LOS ANGELES CITY COUNCIL

## COUNCIL VOTE

14-Nov-00 10:42:14 AM, #5

Items for which Public Hearings Have Not Been Held - Items 7-21

Voting on Item(s): 12-21

Roll Call

|                            |        |
|----------------------------|--------|
| BERNSON                    | Yes    |
| CHICK                      | Yes    |
| FEUER                      | Yes    |
| GALANTER                   | Absent |
| GOLDBERG                   | Absent |
| HERNANDEZ                  | Absent |
| HOLDEN                     | Absent |
| MISCIKOWSKI                | Yes    |
| PACHECO                    | Yes    |
| PADILLA                    | Yes    |
| RIDLEY-THOMAS              | Yes    |
| *SVORINICH                 | Yes    |
| WACHS                      | Yes    |
| WALTERS                    | Yes    |
| FERRARO                    | Absent |
| Present: 10, Yes: 10 No: 0 |        |

**Exhibit E: Negative Declaration and Initial Study**

CITY OF LOS ANGELES  
OFFICE OF THE CITY CLERK  
ROOM 395, CITY HALL  
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

PROPOSED **NEGATIVE DECLARATION**  
(Article V— City CEQA Guidelines)


|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                      |                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|
| LEAD AGENCY<br>LOS ANGELES CITY PLANNING DEPARTMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                      | COUNCIL DISTRICTS<br>CD 12, CD 7, and CD 2 |
| PROJECT TITLE<br>Change of Organization or reorganization pursuant to the Cortese-Knox-Hertzberg Local Reorganization Act of 2000 (Title 5, Division 3, commencing with Section 56000 of the California government Code) relative to an amendment to boundaries of the Sphere of Influence for the City of Los Angeles. "Sphere of Influence per CF-00-2206"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                      | CASE #<br>ENV-2004-7108-ND<br>CF-00-2206   |
| PROJECT LOCATION<br>The proposed Sphere of Influence amendment area is located in north Los Angeles County, outside the existing limits of the City of Los Angeles. The general boundaries of the sphere are west to east, unincorporated areas near Dayton Canyon northward along the Ventura County line to the ridge line of the Santa Susanna Mountains, turning eastwardly along the ridge line of the Santa Susanna Mountains to the limits of the City of Santa Clarita at the Sierra Highway, and following the limits to the south and then east, and continuing to follow the ridge line eastward to and along the boundary of the Angeles National Forest, and turning southward to a terminus south of Little Tujunga Road. The project area is served by Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road. Undeveloped National Forest lands lie to the east of the proposed sphere boundary. To the south is the City of Los Angeles, whose northern boundary is developed primarily with single family residential dwellings to the west of Interstate 5, and light industrial development to the east. West of the proposed project area is the County of Ventura, developed with agricultural uses and scattered single family dwelling units. To the northwest of the project area are the undeveloped Santa Susanna Mountains that separate the San Fernando and Simi Valleys. |                                                                                                                                                      |                                            |
| PROJECT DESCRIPTION<br>The project is a plan for modification to the adopted sphere in order to establish the probable ultimate physical boundaries and urban service area of City of Los Angeles. The plan reflects the most efficient provision of future services including police, fire and utilities, and establishes who would responsibility to provide such services. It is not an annexation nor initiation of annexation proceedings and does not change jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use. The proposed project covers 19,242 acres, or slightly more than 30 square miles.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                      |                                            |
| NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                      |                                            |
| FINDING:<br><br>The City Planning Department of the City of Los Angeles has proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                      |                                            |
| SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                      |                                            |
| Any written comments received during the public review period are attached together with the responses of the Lead City Agency. The project decisionmaker may adopt this mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                      |                                            |
| THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                      |                                            |
| NAME OF PERSON PREPARING THIS FORM<br>M. Susan Whisnant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | TITLE<br>Planning Assistant                                                                                                                          | TELEPHONE NUMBER<br>(818) 374-5044         |
| ADDRESS<br>Los Angeles Department of City Planning<br>Van Nuys Boulevard, Room 351<br>Van Nuys, CA 90401                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | SIGNATURE (Official)<br>Daniel M. Scott, Senior City Planner<br> | DATE<br>November 18, 2004                  |

Exhibit E

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK  
ROOM 615, CITY HALL  
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY  
AND CHECKLIST

(Article IV – City CEQA Guidelines)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                            |                                                                                                                                                                                   |                           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| LEAD CITY AGENCY<br>Los Angeles Department of City Planning                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                            | COUNCIL DISTRICTS<br>CD 12, CD 7, and CD 2                                                                                                                                        | DATE<br>November 18, 2004 |
| RESPONSIBLE AGENCIES<br>Los Angeles County Local Agency Formation Commission (LAFCO)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                            |                                                                                                                                                                                   |                           |
| PROJECT TITLE/NO.<br>Change of Organization or reorganization pursuant to the Cortese-Knox-Hertzberg Local Reorganization Act of 2000 (Title 5, Division 3, commencing with Section 56000 of the California government Code) relative to an amendment to boundaries of the Sphere of Influence for the City of Los Angeles.<br>Sphere of Influence per CF-00-2206                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                            | CASE NO.<br>ENV-2004-7108-ND<br>CF-00-2206                                                                                                                                        |                           |
| PREVIOUS ACTIONS CASE NO.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                            | <input checked="" type="checkbox"/> DOES have significant changes from previous actions.<br><br><input type="checkbox"/> DOES NOT have significant changes from previous actions. |                           |
| PROJECT DESCRIPTION:<br>The project is a plan for modification to the adopted sphere in order to establish the probable ultimate physical boundaries and urban service area of the City of Los Angeles. The plan reflects the most efficient provision of future services including police, fire and utilities, and establishes who would have responsibility to provide such services. It is not an annexation nor initiation of annexation proceedings and does not change jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use. The proposed project covers 19,242 acres, or slightly more than 30 square miles.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                            |                                                                                                                                                                                   |                           |
| VIRONMENTAL SETTING:<br>The project area is comprised of mountain ridges of varying heights, canyons and flat land. It is open space developed with approximately 740 single family dwelling units and multi-family dwellings that serve a population of approximately 1,550 persons including approximately 800 voters (according to the 2000 Los Angeles County Demographic prepared by the Los Angeles County Department of Regional Planning).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                            |                                                                                                                                                                                   |                           |
| PROJECT LOCATION<br>The proposed Sphere of Influence amendment area is located in north Los Angeles County, outside the existing limits of the City of Los Angeles. The general boundaries of the sphere are west to east, unincorporated areas near Dayton Canyon northward along the Ventura County line to the ridge line of the Santa Susanna Mountains, turning eastwardly along the ridge line of the Santa Susanna Mountains to the limits of the City of Santa Clarita at the Sierra Highway, and following the limits to the south and then east, and continuing to follow the ridge line eastward to and along the boundary of the Angeles National Forest, and turning southward to a terminus south of Little Tujunga Road. The project area is served by Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road. Undeveloped National Forest lands lie to the east of the proposed sphere boundary. To the south is the City of Los Angeles, whose northern boundary is developed primarily with single family residential dwellings to the west of Interstate 5, and light industrial development to the east. West of the proposed project area is the County of Ventura, developed with agricultural uses and scattered single family dwelling units. To the northwest of the project area are the undeveloped Santa Susanna Mountains that separate the San Fernando and Simi Valleys. |                            |                                                                                                                                                                                   |                           |
| PLANNING DISTRICT<br>Chatsworth Porter Ranch, Northridge, Granada Hills-Knollwood, Sylmar, Sunland-Tujunga Lakeview Terrace- Shadow Hills–East La Tuna Canyon                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                            | STATUS:<br><input type="checkbox"/> PRELIMINARY<br><input type="checkbox"/> PROPOSED<br><input checked="" type="checkbox"/> ADOPTED: 7/14/1993, 7/10/1996, 8/6/1987, 11/18/1997   |                           |
| EXISTING ZONING<br>Land use designations would follow the County of Los Angeles General Plan as follows: N1 (Non-urban 1), N2 (Non-urban 2: 0.5 to 1.0 dwelling units per acre), U1 (Urban 1: 1.1 to 3.3 dwelling units per acre), Urban 2 (Urban 2: 3.4 to 6.6 dwelling units per acre), U3 (Urban 3: 6.7 to 15.0 dwelling units per acre), U4 (Urban 4: 15.1 to 40 dwelling units per acre), C (Commercial), M (Industrial), RR (Resort recreational), W (Flood way and flood plains: Special Management Area, and S (Significant Ecological Area (SEA): Special Management Area).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | MAX. DENSITY ZONING<br>n/a | <input type="checkbox"/> DOES CONFORM TO PLAN<br><br><input type="checkbox"/> DOES NOT CONFORM TO PLAN                                                                            |                           |
| PLANNED LAND USE & ZONE<br>No change in land use and zoning.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | MAX. DENSITY PLAN<br>n/a   |                                                                                                                                                                                   |                           |

|                                                                                                                                                                              |                          |                                                                                                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|----------------------------------------------------------------------------------------------------|
| PLANNED LAND USE & ZONE<br>No change in land use and zoning.                                                                                                                 | MAX. DENSITY PLAN<br>n/a | <input type="checkbox"/> DOES CONFORM TO PLAN<br><input type="checkbox"/> DOES NOT CONFORM TO PLAN |
| SURROUNDING LAND USES<br>Undeveloped National Forest lands, single family residential dwellings, light industrial development, agricultural lands, Sunshine Canyon landfill. | PROJECT DENSITY<br>n/a   | <input checked="" type="checkbox"/> NO DISTRICT PLAN                                               |

DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

|                                                                                     |                     |
|-------------------------------------------------------------------------------------|---------------------|
|  |                     |
| Daniel M. Scott                                                                     | Senior City Planner |
| SIGNATURE                                                                           | TITLE               |

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," cross referenced).

- a)

Earlier Analysis Used. Identify and state where they are available for review.
- b)

Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
- c)

Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6)

Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
- 7)

Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8)

This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 9)

The explanation of each issue should identify:

a)

The significance criteria or threshold, if any, used to evaluate each question; and

b)

The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a tentially Significant Impact" as indicated by the checklist on the following pages.

- ☐ Aesthetics

☐ Agricultural Resources

☐ Air Quality

☐ Biological Resources

☐ Cultural Resources

☐ Geology/Soils

☐ Hazards & Hazardous Materials

☐ Hydrology/Water Quality

☐ Land Use/Planning

☐ Mineral Resources

☐ Noise

☐ Population/Housing

☐ Public Services

☐ Recreation

☐ Transportation/Traffic

☐ Utilities/Service Systems

☐ Mandatory Findings of Significance

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

BACKGROUND

|                                         |  |                   |
|-----------------------------------------|--|-------------------|
| PROPONENT NAME                          |  | PHONE NUMBER      |
| City of Los Angeles                     |  | (818) 374-5069    |
| PROPONENT ADDRESS                       |  |                   |
| 6262 Van Nuys Boulevard, Room 351       |  |                   |
| Van Nuys, CA 91401-2709                 |  |                   |
| AGENCY REQUIRING CHECKLIST              |  | DATE SUBMITTED    |
| Los Angeles Department of City Planning |  | November 18, 2004 |
| PROPOSAL NAME (If Applicable)           |  |                   |
| Sphere of Influence per CF-00-2206      |  |                   |

ENVIRONMENTAL IMPACTS

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

|                                                                                                                                                                                                                                                                                                                                                                                         | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|--------------------------------------------------------|------------------------------|-------------------------------------|
| I. AESTHETICS. Would the project:                                                                                                                                                                                                                                                                                                                                                       |                                |                                                        |                              |                                     |
| a. Have a substantial adverse effect on a scenic vista?                                                                                                                                                                                                                                                                                                                                 | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?                                                                                                                                                     | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| c. Substantially degrade the existing visual character or quality of the site and its surroundings?                                                                                                                                                                                                                                                                                     | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?                                                                                                                                                                                                                                                                   | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| II. AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use assessing impacts on agriculture and farmland. Would the project: |                                |                                                        |                              |                                     |
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?                                                                                                                                                     | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?                                                                                                                                                                                                                                                                                                     | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?                                                                                                                                                                                                                           | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| III. AIR QUALITY. The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:                                                                                                                                                                               |                                |                                                        |                              |                                     |
| a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?                                                                                                                                                                                                                                                                                                | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?                                                                                                                                                                                                                                                                      | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |



|                                                                                                                                                                                                                                | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Expose sensitive receptors to substantial pollutant concentrations?                                                                                                                                                         | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Create objectionable odors affecting a substantial number of people?                                                                                                                                                        | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**IV. BIOLOGICAL RESOURCES.** Would the project:

|                                                                                                                                                                                                                                                                                                              |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ?                                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?                                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?                                                                                                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**V. CULTURAL RESOURCES:** Would the project:

|                                                                                                                   |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

|                                                                                                                      | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------|--------------------------------|--------------------------------------------------------|------------------------------|-------------------------------------|
| b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5? | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?              | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d. Disturb any human remains, including those interred outside of formal cemeteries?                                 | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

**VI. GEOLOGY AND SOILS.** Would the project:

- a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving :
- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
  - ii. Strong seismic ground shaking?
  - iii. Seismic-related ground failure, including liquefaction?
  - iv. Landslides?
- b. Result in substantial soil erosion or the loss of topsoil?
- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
- e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

|                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**VII. HAZARDS AND HAZARDOUS MATERIALS.** Would the project:

- a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials

|                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|

|                                                                                                                                                                                                                                                                  | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?                                                                  | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?                                                                                                  | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?                                   | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?                                                                                                          | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?                                                                                                                                        | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?                                             | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**VIII. HYDROLOGY AND WATER QUALITY.** Would the proposal result in:

|                                                                                                                                                                                                                                                                                                                                                                                      |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Violate any water quality standards or waste discharge requirements?                                                                                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?                                                                                                                                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                                                                                                            | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in an manner which would result in flooding on- or off site? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?                                                                                      | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. Otherwise substantially degrade water quality?                                                                                                                                                                                                                          | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?                                                                                                               | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| h. Place within a 100-year flood plain structures which would impede or redirect flood flows?                                                                                                                                                                              | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| i. Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?                                                                                                        | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| j. Inundation by seiche, tsunami, or mudflow?                                                                                                                                                                                                                              | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**IX. LAND USE AND PLANNING.** Would the project:

|                                                                                                                                                                                                                                                                                                 |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Physically divide an established community?                                                                                                                                                                                                                                                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan?                                                                                                                                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**X. MINERAL RESOURCES.** Would the project:

|                                                                                                                                                                        |                          |                          |                          |                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XI. NOISE.** Would the project:

|                                                                                                                                                                                                                                                                     | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|--------------------------------------------------------|------------------------------|-------------------------------------|
| a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?                                                                               | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                              | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                                      | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                          | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?                                                                                                      | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

**XII. POPULATION AND HOUSING.** Would the project:

|                                                                                                                                                                                                          |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?                                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XIII. PUBLIC SERVICES.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

|                       |                          |                          |                          |                                     |
|-----------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Fire protection?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

|                                                   | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less Than Significant Impact | No Impact                           |
|---------------------------------------------------|--------------------------------|--------------------------------------------------------|------------------------------|-------------------------------------|
| c. Schools?                                       | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| d. Parks?                                         | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |
| e. Other governmental services (including roads)? | <input type="checkbox"/>       | <input type="checkbox"/>                               | <input type="checkbox"/>     | <input checked="" type="checkbox"/> |

#### XIV. RECREATION.

|                                                                                                                                                                                                                |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

#### XV. TRANSPORTATION/CIRCULATION. Would the project:

|                                                                                                                                                                                                                                                                                     |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to ratio capacity on roads, or congestion at intersections)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?                                                                                                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?                                                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?                                                                                                                                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Result in inadequate emergency access?                                                                                                                                                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Result in inadequate parking capacity?                                                                                                                                                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?                                                                                                                                                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XVI. UTILITIES.** Would the project:

|                                                                                                                                                                                                                                   | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?                                                                                                                               | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                            | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                                      | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?                                                                             | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?                                                                                                            | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| g. Comply with federal, state, and local statutes and regulations related to solid waste?                                                                                                                                         | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**XVII. MANDATORY FINDINGS OF SIGNIFICANCE.**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Does the project have impacts which are individually limited, but cumulatively considerable?<br>("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).                                                                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?                                                                                                                                                                                                                                                                                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**DISCUSSION OF THE ENVIRONMENTAL EVALUATION** (Attach additional sheets if necessary)

The list of impact categories and subcategories were prepared pursuant to the public Resources Code and the California Environmental Quality Act (CEQA). [Please see the following sections of the Public Resources Code and CEQA Guidelines: Public Resources code section 21082.2 (Significant effect based on substantial evidence, not public controversy or speculation), CEQA sections 15063 (Initial Study), 15064 (Determining the Significance of Environmental Effects Caused by a Project), 15065 (Mandatory Findings of Significance), 15070 (Decision to Prepare a Negative or Mitigated Negative Declaration; ND/MND), 15071 (Contents of ND/MND)) and 15047 (Consideration and Adoption of a Negative Declaration or Mitigated Negative Declaration)]

The Public Resources Code and CEQA Guidelines explicitly indicate "substantial evidence" as a basis for determining the significance of impacts on the environment caused by a Project. Public Resources code section 21082.2 (c) states - "argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." Public Resources Code section 21082.2 (b) states - "The existence of public controversy over the environmental effects of a project shall not require preparation of an environmental impact report if there is no substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment" (also see CEQA Guidelines sections 15382 and 15384).

Furthermore, the determination to prepare a Negative or Mitigated Negative Declaration (ND/MND) or an Environmental Impact Report (EIR) is reached by the examination of certain facts and supporting data, which clearly support the method of disclosure (i.e. ND/MND, EIR), alternatives, and mitigation of environmental impacts. The following criteria must be evident when an EIR is required by the Lead Agency (CITY OF LOS ANGELES) per CEQA Guidelines section 15065 (Mandatory Findings of Significance); a project will have a significant effect if it will:

- Substantially degrade environmental quality
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self-sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that will cause substantial adverse effects on human beings.

| PREPARED BY       | TITLE              | TELEPHONE #    | DATE          |
|-------------------|--------------------|----------------|---------------|
| M. Susan Whisnant | Planning Assistant | (818) 374-5044 | November 2004 |

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**Exhibit F: Sphere of Influence Amendment Application**

**LOS ANGELES SPHERE OF INFLUENCE AMENDMENT APPLICATION**  
**(Pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act**  
**of 2000, Division 3, Title 5 Commencing with Section 56000,**  
**of the Government Code)**

**TO: LOCAL AGENCY FORMATION COMMISSION**

County of Los Angeles  
Room 383, Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

**DESIGNATION OF PROPOSAL:** Amendment to Sphere of Influence

**AFFECTED CITY/DISTRICT:** City of Los Angeles

**RELATED JURISDICTIONAL CHANGES:** None

**GENERAL LOCATION OF PROPOSAL:** The proposed Sphere of Influence amendment area is located in north Los Angeles County, outside the existing limits of the City of Los Angeles. The general boundaries of the sphere are west to east, unincorporated areas near Dayton Canyon northward along the Ventura County line to the ridge line of the Santa Susana Mountains, turning eastwardly along the ridge line of the Santa Susana Mountains to the limits of the City of Santa Clarita at the Sierra Highway, and following the limits to the south and then east, and continuing to follow the ridge line eastward to and along the boundary of the Angeles National Forest, and turning southward along the limits of the City of Los Angeles to a terminus south of Little Tujunga Road.

**THOMAS GUIDE PAGE(S):** LA County: 480, 481, 482, 499, 500, 503, 504, 529,  
559, 4640, 4641, 4642  
Ventura County: 367, 479

**PROPOSAL INITIATED BY:** ☒ Resolution ☐ Landowner/Voter Petition

**APPLICANT:** City of Los Angeles  
6262 Van Nuys Blvd., Room 351  
Van Nuys, CA 91401-2709

**SIGNED:** \_\_\_\_\_  
Daniel M. Scott, Senior City Planner

**TELEPHONE:** (818) 374-5069

**DATE:** May 4, 2005

## I. THE SUBJECT AREA

### A. GENERAL DESCRIPTION

1. **Acres or square miles:** 19,242 acres or slightly more than 30 square miles.
2. **Major highways and streets serving the area:** The proposed area is served by Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road.
3. **Topography:** Mountain ridges of varying heights; canyons and flat land make up the general topography of the area.
4. **Physical boundaries):**  
Santa Susana Mountain ridge line.

### B. POPULATION AND HOUSING

1. **Estimated population:** The estimated population for the proposed Sphere of Influence outside of the City limits is approximately 1,550 persons.
2. **Number of registered voters:** Approximately 800 voters.  
(2000 Los Angeles County Demographic Profile Prepared by the Los Angeles County Department of Regional Planning)
3. **Number and type of dwelling units:** The area within the proposed Sphere of Influence outside the incorporated city limits contains approximately 740 single-family and multi-family dwelling units. The area contains housing that is primarily single family dwelling units.

### C. LAND USE AND ZONING

1. **Existing land use in the subject area:** The existing land uses in the subject area are open space, with scattered single- family homes and multi-family homes.
2. **Planned land use designations in the surrounding area:**  
Land use designations will not change as a result of the amendment. The County of Los Angeles General Plan covers the area included within the proposed amendment area to the sphere of influence. The designations include: N1 (Non-urban 1), N2 (Non-urban 2: 0.5 to 1.0 dwelling units per acre), U1 (Urban 1: 1.1 to 3.3 dwelling units per acre), Urban 2 (Urban 2: 3.4 to 6.6 dwelling units per acre), U3 (Urban 3: 6.7 to 15.0 dwelling units per acre), U4 (Urban 4: 15.1 to 40 dwelling units per acre), C (Commercial), M (Industrial), RR (Resort recreational), W (Floodway and floodplains: Special Management Area), and S (Significant Ecological Area [SEA]: Special Management Area).

## II THE PROPOSAL

- A. **Reasons for initiation of this proposal:** The Sphere of Influence Study was prepared by the City of Los Angeles to plan for the probable ultimate physical boundaries and urban service area of the a potion of the northern border of the City of Los Angeles. It is presented as an informational and advocacy tool to assist members of the Local Agency Formation Commission (LAFCO) in making their determinations pursuant to Government Code Section 56076.
- B. **Alternate courses of action:** Alternate course of action are denial of the proposed sphere and continuation of the of the current sphere with a border coterminous with the limits of the City of Los Angeles.
- C. **Services and/or costs to residents or landowners in the area:** Services and/or costs to residents or landowners in the area would not be increased, reduced, or eliminated as a result of this proposal.
- D. **Terms or conditions requested as part of this proposal:** Standard LAFCO conditions are anticipated and acceptable.

## III. GENERAL

- A. **Names and addresses of persons, organization or agencies known to you who may be opposed to this proposal:**  
Carlyle W. Hall, Jr. for Las Lomas  
Akin Gump Strauss Hauer & Feld  
2029 Century Park East, Suite 2400  
Los Angeles, CA 90067-3012  
(310) 728-3242
- B. **Names and addresses of persons who are to receive notice of hearing, staff report, and minutes:**  
  
City of Los Angeles, Planning Department  
c/o Susan Whisnant, Planning Assistant  
6262 Van Nuys Blvd. Room 351  
Van Nuys, CA 91401-2709  
  
John Wickham, CLA  
City Hall 255  
200 North Spring Street  
Los Angeles, CA 90012

Dale Thrush, CD 2  
City Hall 475  
200 North Spring Street  
Los Angeles, CA 90012

Tom Henry, CD 3  
City Hall 450  
200 North Spring Street  
Los Angeles, CA 90012

Dan Rosales, CD 7  
City Hall 465  
200 North Spring Street  
Los Angeles, CA 90012

Kevin Keller, CD 11  
City Hall 415  
200 North Spring Street  
Los Angeles, CA 90012

Phyllis Winger, CD 12  
City Hall 405  
200 North Spring Street  
Los Angeles, CA 90012

**Exhibit G: Resolution to Initiate Proceedings to Adopt an  
Amended Sphere of Influence**

Resolution No. \_\_\_\_\_

A RESOLUTION OF THE APPLICATION BY THE  
CITY COUNCIL OF THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES,  
STATE OF CALIFORNIA,  
REQUESTING THE LOCAL AGENCY FORMATION COMMISSION OF THE COUNTY  
OF LOS ANGELES TO  
INITIATE PROCEEDINGS TO ADOPT AN AMENDED SPHERE OF INFLUENCE FOR,  
AND AS PROPOSED BY, THE CITY OF LOS ANGELES.

WHEREAS, the City of Los Angeles desires to initiate proceedings pursuant to the  
Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, Division 3,  
commencing with Section 56000 of the California Government Code;

WHEREAS, this proposal is consistent with the spirit and intent of sections 56427 and  
56428 of the California State Code;

WHEREAS, the territory proposed to be included in this sphere of influence is set forth  
in Exhibit "A", attached hereto and by this reference incorporated;

WHEREAS, the City has prepared and adopted a comprehensive general plan for the  
City and generally all the territories within the proposed sphere of influence area;

WHEREAS, the City Council of the City of Los Angeles conducted a public meeting on  
(*insert date*) pursuant to applicable law, to consider the proposed sphere of influence;

**Exhibit G**

WHEREAS, the reasons for this proposed sphere of influence are as follows:

3. Facilitate orderly growth in the unincorporated areas adjacent to the City of Los Angeles;
4. Coordinate property development standards and encourage timely provision of adequate and essential services such as streets, sewer, water, police and fire protection, parks and recreation, flood control, and solid waste disposal, as urbanization of unincorporated areas occurs;
5. Promote cooperative planning between the City of Los Angeles and the County of Los Angeles, various public/private service entities, and major landowners, and so facilitate proper implementation of their respective general or master plans;
6. Assist all government agencies and private entities in planning and scheduling the logical, orderly, and economic extension of their facilities and services, thus avoiding expensive and unnecessary duplication of effort;
7. Promote, assist, and enhance property owners' ability to plan comprehensively, and with reasonable assurance, for the ultimate use and development of their lands; and

WHEREAS, the City Council of the City of Los Angeles, California, has considered all evidence, oral and documentary, and is advised in the premises.

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Los Angeles, California, does hereby determine and find as follows:



Section 1. This resolution is hereby adopted and approved by the City Council, and the Local Agency Formation Commission of the County of Los Angeles is hereby requested to initiate proceedings to adopt an amended sphere of influence as mapped in Exhibit "A", which is incorporated herein by this reference, according to the terms and conditions stated above, and in the manner provided by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

Section 2. The City Council hereby directs and authorizes the City Clerk of the City of Los Angeles to file a certified copy of this resolution with the Executive Officer of the Local Agency Formation Commission of the County of Los Angeles.

Section 3. The City Clerk shall certify the adoption of this resolution.

PASSED, APPROVED, AND ADOPTED this \_\_\_\_\_ day of \_\_\_\_\_, 2005.

\_\_\_\_\_  
James K. Hahn, Mayor

ATTEST:

\_\_\_\_\_  
J. Michael Carey, City Clerk  
STATE OF CALIFORNIA     )  
COUNTY OF LOS ANGELES     )  
CITY OF LOS ANGELES     )

I, J. Michael Carey, City Clerk of the city of Los Angeles, do hereby certify that the foregoing Resolution was duly adopted by the City Council of the City of Los Angeles.

DEPARTMENT OF  
CITY PLANNING  
200 N. SPRING STREET, ROOM 525  
LOS ANGELES, CA 90012-4801  
AND  
2 VAN NUYS BLVD., SUITE 351  
VAN NUYS, CA 91401  
CITY PLANNING COMMISSION

MABEL CHANG  
PRESIDENT  
DAVID L. BURG  
VICE-PRESIDENT  
JOY ATKINSON  
ERNESTO CARDENAS  
SUSAN CLINE  
MARY GEORGE  
MICHAEL MAHDESIAN  
BRADLEY MINDLIN  
THOMAS E. SCHIFF  
GABRIELE WILLIAMS  
COMMISSION EXECUTIVE ASSISTANT  
(213) 978-1300

CITY OF LOS ANGELES  
CALIFORNIA



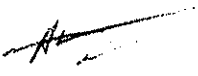
JAMES K. HAHN  
MAYOR

EXECUTIVE OFFICES

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(213) 978-1274  
FAX: (213) 978-1275  
INFORMATION  
(213) 978-1270  
(818) 374-5050  
www.lacity.org/PLN

**DATE:** April 6, 2005

**TO:** Honorable Ed Reyes  
Planning and Land Use Management Committee  
Los Angeles City Council

**FROM:** Con Howe   
Director of Planning  
Los Angeles Department of City Planning

**SUBJECT:** Amendment to the Boundaries of the Sphere of Influence  
CF-00-2206

**BACKGROUND**

On November 14, 2000, the City Council adopted a Motion (Bernson-Galanter, CF 00-2206) instructing the City Planning Department, with assistance from the Chief Legislative Analyst, to prepare an application to the Local Agency Formation Commission of the County of Los Angeles to amend the boundaries of the sphere of influence for the City of Los Angeles pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. The sphere of influence is the geographic area in Los Angeles County that is determined to be the probable, ultimate physical boundaries and service area for the City of Los Angeles. The current boundary of the sphere for the City of Los Angeles is coterminous with the incorporation limits, as shown on Exhibit A.

**BOUNDARY RECOMMENDATION**

The requested northern boundary of the proposed sphere of influence amendment follows the natural ridgeline of the San Gabriel and Santa Susana Mountains. Staff recommends that the boundary of the sphere be expanded to include the areas near Dayton Canyon between the Ventura County Line and the City of Los Angeles on the west, north along the Ventura County line to the ridgeline of the Santa Susanna



Mountains, turning east following the ridgeline of the Santa Susana Mountains (west of the 405 Freeway) to the limits of the City of Santa Clarita at the Sierra Highway. The boundary then follows the limits to the south and then east, and continues to follow the ridge line eastward to the boundary of the Angeles National Forest before turning southward following the boundary of the National Forest and the unincorporated areas to a terminus south of Little Tujunga Road. In some areas, these proposed boundaries follow the current boundary with deviations to include unincorporated areas between the City of Los Angeles and Ventura County and between the City of Los Angeles and the Angeles National Forest. Along the northern segment, the border was chosen to include unincorporated areas in the San Fernando Valley that are south of the natural ridgeline of the Santa Susana Mountains as shown on Exhibit B. Slight modifications were made to account for ownership of parcels. The ridgeline separates the San Fernando valley from the Santa Clarita Valley and defines the northern edge of the drainage basin for the San Fernando Valley. Water flowing from the southern face of the ridge feeds the Los Angeles River and the valley aquifer. Municipal services that are gravity driven such as sewer service can be provided more efficiently by the local agency located downward from the ridge.

Portions of the Los Angeles River watershed that are in the proposed sphere of influence help mitigate flooding, maintain water quality and quantity, recycle nutrients, and provide an important habitat for plants and animals. The City Council established the Los Angeles Ad Hoc River Committee in June 2002 to focus on major revitalization efforts for the Los Angeles River including opportunities for parks, trails, recreation, nature, neighborhood identity, jobs, community development, tourism, and civic pride. One of the guiding principles for the Los Angeles River is viewing the river as an important natural resource with emphasis on the ecology of the river, flood management, and sustainability. Encompassing the watershed for the Los Angeles River in the sphere of influence for the City of Los Angeles is both logical and paramount to the continued success of revitalization efforts.

The Los Angeles River watershed is an important boundary on which to base the Sphere of Influence as it directly impacts the delivery of a wide range of services related to stormwater and water quality. Rain that falls within the unincorporated portions of the Los Angeles River watershed eventually passes through the City of Los Angeles. Any activities that generate water-borne pollutants regulated by the State will affect the City. The City of Los Angeles settled two lawsuits, in 2002 and 2003, related to State requirements concerning TMDL requirements in stormwater flows. Voters in 2004 passed a \$500 million bond to address stormwater needs and general environmental enhancements. Providing the City a Sphere of Influence over this area improves the City's ability to provide stormwater management services to the area and ensures more efficient, direct management responsibility for any pollutants that occur throughout the Los Angeles River watershed because there would be fewer governmental agencies with responsibility for that area.

#### **DESCRIPTION OF PROPOSED AMENDMENT AREA**

The proposed amendment area for the City's sphere of influence covers 19,242 acres, or slightly more than 30 square miles. Major ridgelines of the transverse Santa Susana Mountain Range are to the north and west, and metropolitan communities of the

Los Angeles Basin are to the south. Portions of Ventura County adjacent to the amendment area contain parklands, agricultural land uses and scattered single-family residences. Sunshine Canyon Landfill is adjacent to the area on the north. The project area is contiguous to portions of Council Districts 3, 12, 7 and 2 and community plan areas of Canoga Park – Winnetka - Woodland Hills - West Hills, Chatsworth - Porter Ranch, Granada Hills – Knollwood, Northridge, Sylmar, and Sunland - Tujunga - Shadow Hills - Lakeview Terrace - East La Tuna Canyon.

The land uses in the northern San Fernando Valley within the City of Los Angeles are classified mainly as Open Space or Minimum Residential with some Very Low and Low density Residential in the Porter Ranch area, as shown on Exhibit C. The land in the proposed amended area is designated by the County General Plan primarily as Non-Urban and Open Space. There are rural communities near Little Tujunga Road, and north of the 118 near the current western city border. Deerlake development has been approved north of the rural community of Twin Lakes. A small acreage of commercial and industrial developments exist at intersection of Interstate 210 and State Highway 118. Major arterial roads in the proposed amendment area include Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road. Metrolink runs through the proposed area between Interstate 5 and State Highway 14.

Mountain ridges of varying heights, canyons, and flat land define the topography of the proposed amendment area. It is largely undeveloped land and is within the Santa Monica Mountains Conservancy Zone--Rim of the Valley Trail Corridor, a system of natural lands that shelters wildlife and extends recreational opportunities in the San Fernando and San Gabriel Valley areas, as shown on Exhibit D. The northwestern portion of the proposed sphere of influence contains a Significant Ecological Area (SEA) as defined and delineated in conjunction with the Land Use and Open Space Elements of the County General Plan.

Major tributaries for the Los Angeles River originate on the southern slopes of the Santa Susana Mountains within the proposed sphere of influence for the City of Los Angeles. These include the Santa Susana Wash, Browns Canyon Wash, Limekiln Canyon Wash, Wilbur Creek, Aliso Canyon Wash, and Bull Creek. The headwaters of the Los Angeles River are in the Simi Hills, formed by Chatsworth Creek, Dayton Canyon Wash, Bell Creek and Calabasas. These tributaries provide an important habitat for plants and animals.

Recreation areas containing hiking, biking and equestrian trails are adjacent to and within the proposed amendment area. Parks include: Bell Canyon Park, Knapp Park, Roscoe-Valley Circle Park, Chatsworth Nature Preserve/Reservoir, Chatsworth Oaks Park, Rocky Peak Park, Michael D. Antonovich Regional Park at Joughin Ranch, Brown's Canyon Park, Moonshine Canyon Park, Limekiln Canyon Park, Porter Ridge Park, O'Melveny Park, Santa Clarita Woodlands Park, Stetson and Wilson Canyon debris basins, Wilson Canyon Park, and Veterans Memorial County Park. The Angeles National Forest is north of the proposed sphere east of the 405 freeway.

## PURPOSE OF THE SPHERE OF INFLUENCE

A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In general, the purpose of a sphere of influence is to:

1. Facilitate orderly growth in the unincorporated areas adjacent to a city;
2. Coordinate property development standards, and encourage timely provision of adequate and essential services, such as parks, recreation, and flood control and, if urbanization of unincorporated areas occurs, streets, sewer, water, solid waste disposal, and police and fire protection;
3. Promote cooperative planning between the city and county, various public/private service entities, major landowners, and facilitate proper implementation of their respective general or master plans;
4. Assist all government agencies and private entities in any planning and scheduling for extension of their facilities and services to assure it will be done in a logical, orderly, and economical manner, thus avoiding expensive and unnecessary duplication of effort; and
5. Promote, assist, and enhance property owners' ability to plan comprehensively, and with reasonable assurance for the ultimate use and development of their lands.

## IMPACT OF THE SPHERE AMENDMENT

Historically, the City of Los Angeles has provided services to the proposed amendment area. The ridgeline of the Santa Susana Mountains and the Angeles National Forest provide natural dividing lines between Los Angeles and the jurisdictions to the north. The City has an extensive network of police, fire, sanitation, and other services in operation adjacent to this areas and logically would provide the most effective service to these areas. The Los Angeles Police Department provides police service, and the Los Angeles City Fire Department provides fire and paramedic service within the municipal boundaries and also serve the surrounding unincorporated area of Los Angeles.

An expansion of the City's sphere of influence would formalize a procedure for the County to refer proposed actions and proposals for unincorporated areas to the City for review and comment. It is imperative that the City have a role in any proposals for development of upstream areas since increased urbanization would tax the carrying capacity of the Los Angeles River by decreasing permeable area, resulting in a rise in inflow peaks and volumes into the river. Several of the tributaries that are in the sphere amendment area are currently classified in the 500 year flood plain. The City has a need to assure adequate flood protection, reduce the velocity of storm water and runoff, and keep stormwater pollution levels below the total maximum daily loads.

An amended sphere of influence would allow the City of Los Angeles review authority for projects located inside Los Angeles County, outside of the City Limits, but within the

sphere area. Even though procedures for interagency referrals would change, the existing jurisdictional authority for projects within the unincorporated area would remain with the County of Los Angeles. No environmental plans or policies will be altered due to modifications of the City's sphere of influence boundary, nor will changes occur to jurisdictional authorities. An Initial Study was prepared and it was determined that amending the sphere of influence would have no environmental impacts. A Negative Declaration was published for the amendment to the sphere of influence and is included as Exhibit E.

Amending the boundary for the sphere of influence will have no effect on development—it will be neither easier nor harder. The primary effect of the boundary change will be to establish which government entity is the logical service provider. Becoming part of the sphere of influence does not change any processes or procedures. Any impact would come if an area is annexed, which can be requested without the amended sphere. Currently, unincorporated areas are governed by Los Angeles County; if annexed to the City of Los Angeles, they would be governed by the regulations and processes of the City. Any territories to be annexed would be pre-zoned. In the pre-zoning process, the City is required to comply with the California Environmental Quality Act and follow the same procedures and allow the same public comment as for a change in zone.

Although an expanded sphere of influence would facilitate processing requests for annexation from property owners and residents of inhabited areas, modification to a sphere of influence is not an annexation, nor does modification to an adopted sphere initiate annexation proceedings. No changes to jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use would ensue as a result of adopting a sphere of influence. The proposed area to be included in the amended sphere of influence of the City of Los Angeles will remain as part of the unincorporated portion of the County of Los Angeles. Future uses must be consistent with the General Plan and Zoning of Los Angeles County. A requirement of Government code Section 56425 is that any land included within the sphere of influence of the City of Los Angeles must be consistent with all parts of the General Plan for Los Angeles. No one part takes precedence. Land Use designations and zoning for the City of Los Angeles are assigned if and when the land in the sphere is annexed.

Because no development is being proposed as part of this project, the modifications to the City of Los Angeles's existing sphere of influence boundary will not result in a direct impact upon open space. Parks and recreation services provided within the amended sphere area would remain under the direct influence of the County of Los Angeles. The proposal will therefore not result in an impact to the quantity of existing recreation opportunities currently provided throughout the San Fernando Valley. Decisions on development or providing open space will depend on ownership of the land and the desires of the owner within established regulatory requirements.

## ROLE OF LAFCOs

LAFCOs exercise both regulatory and planning functions. They are responsible for annexations and detachments of territory to and/or from cities and special districts, incorporations of new cities, formations of new special districts, and consolidations, mergers, and dissolutions of existing districts. In addition, LAFCOs must review and approve contractual service agreements, determine spheres of influence for each city and district, and may initiate proposals involving district consolidation, dissolution, establishment of subsidiary districts, mergers, and reorganizations (combinations of these jurisdictional changes).

The major planning task of LAFCOs is the establishment of a sphere of influence for each local agency in its jurisdiction. Prior to 2000, the State of California approved the formation of many new local government agencies, often with little forethought as to the ultimate governance structures in a given region. Lack of coordination and adequate planning led to a multitude of overlapping, inefficient jurisdictional and service boundaries, and to the premature conversion/loss of California's agricultural and open-space lands. The Cortese-Knox-Hertzberg Act established Local Agency Formation Commissions as the regulatory agencies with countywide jurisdiction. Their purpose was to discourage urban sprawl, while encouraging orderly and efficient provision of services such as water, sewer and fire protection.

In considering an application to amend a local agency Sphere of Influence, LAFCOs must consider and make written determinations with regard to the following factors:

1. The present and planned land uses in the area, including agricultural and open space lands;
2. The present and probable need for public facilities and adequacy of public facilities and services in the area;
3. The present capacity of public facilities and adequacy of services that the agency provides or is authorized to provide; and
4. The existence of any social or economic communities of interest in the area, if the commission determines that they are relevant to the agency.

Upon adoption, LAFCOs use a sphere of influence as a factor in making determinations and decisions for proposals concerning cities or special districts and adjacent territories over which LAFCO has authority and jurisdiction. LAFCOs coordinate the orderly development of a community by reconciling the differences between city and county plans so that the most efficient urban service arrangements are created for the benefit of area residents and property owners.

LAFCO requires consistency with city general plans in adopting or amending a sphere of influence. The Commission, when establishing spheres of influence, considers joint City/County Specific Plans and factors such as density policies, development standards, geology, and future use. LAFCO also considers fiscal impacts of proposed sphere amendments. LAFCO has sole responsibility for establishing a city's sphere of influence. Further, LAFCO is not required to establish a sphere that is greater than the

Amendment to the SOI

city's existing boundaries. Spheres of influence for cities and special districts may overlap when both agencies expect to provide service to the area.

### **RECOMMENDATION**

The Los Angeles Department of City Planning recommends that the City request an amendment to the boundaries of the sphere of influence for the City of Los Angeles as shown on Exhibit A attached hereto. Accordingly, it recommends that the City Council approve the application to the Local Agency Formation Commission of the County of Los Angeles to amend the sphere of influence pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, included as Exhibit F and adopt the Resolution included as Exhibit G.

cc: Honorable Wendy Gruel, District 2  
Honorable Denis Zine, District 3  
Honorable Jack Weiss, District 5  
Honorable Tony Cardenas, District 6  
Honorable Alex Padilla, District 7  
Honorable Cindy Miscikowski, District 11  
Honorable Greig Smith, District 12  
Mr. John Wickham, Office of the Chief Legislative Analyst



## **Exhibits**

- A: Map of Current and Proposed Sphere of Influence
- B: Map of LA River and Major Tributaries
- C: Map of San Fernando Valley General Land Use and County Land Use
- D: Map of the Rim of the Valley Corridor
- E: Negative Declaration and Initial Study
- F: Sphere of Influence Amendment Application
- G: Resolution to Initiate Proceedings to Adopt an Amended Sphere of Influence

**Exhibit A: Map of Current and Proposed Sphere of Influence**







## **Exhibit B: Map of LA River and Major Tributaries**

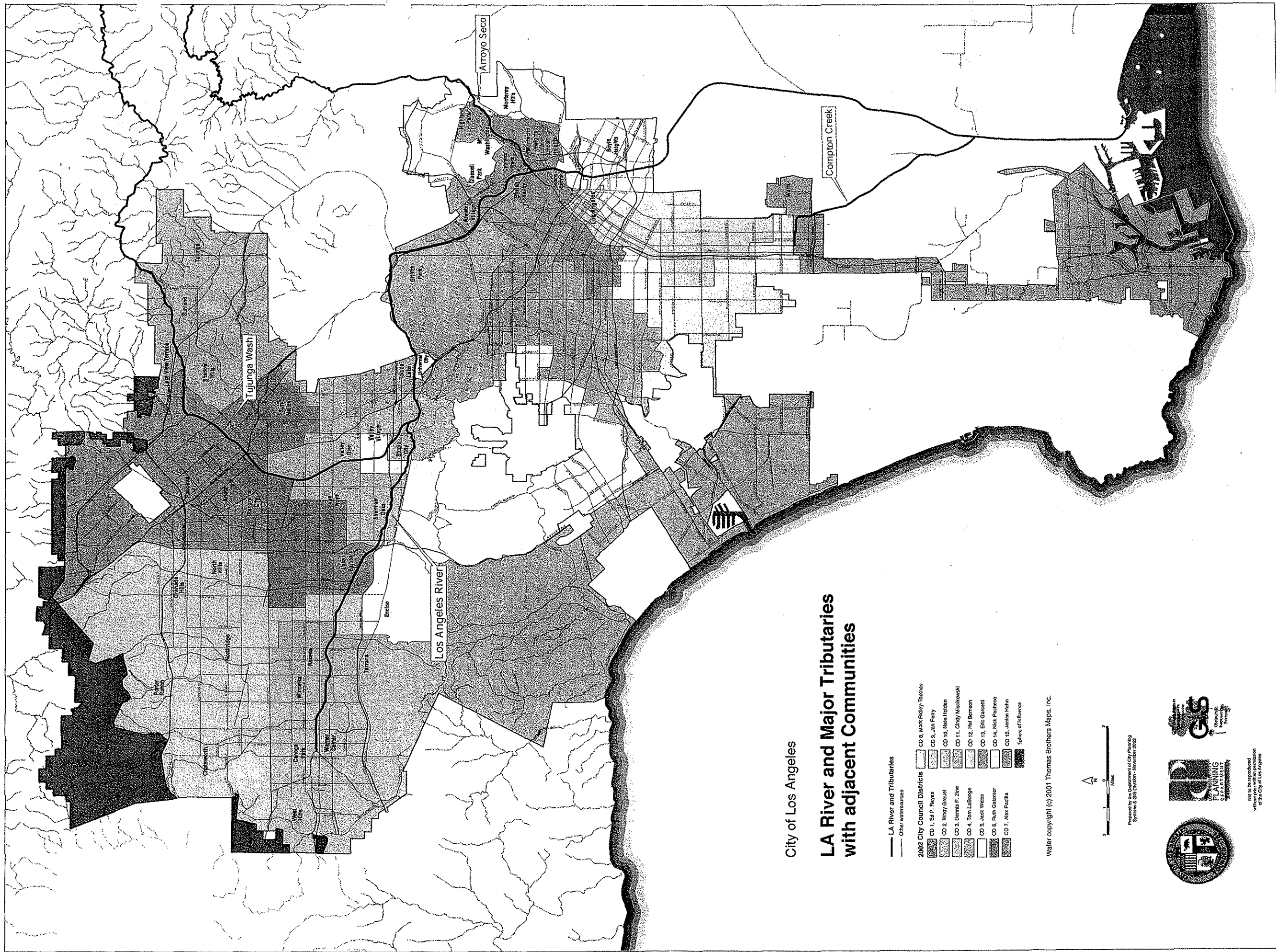


Exhibit B

**Exhibit C: Map of San Fernando Valley General Land Use  
and  
County Land Use**



City of Los Angeles

# San Fernando Valley General Plan Land Use

**County Land Use Designations in SOI**

- 1 Low Density Residential (1 to 5 du/ac)
- 2 Low/Medium Density Residential (6 to 12 du/ac)
- C Major Commercial
- I Major Industrial
- P Public and Semi-Public Facilities
- R Non-Urban
- O Open Space
- TC Transportation Corridor
- RC Rural Communities

**Residential**

- Minimum
- Very Low Density
- Very Low I
- Very Low II
- Low Density
- Low I
- Low II
- Low Medium Density
- Low Medium I
- Low medium II
- Medium Density
- High Medium Density
- High Density
- Very High Density

**Commercial**

- Neighborhood Commercial
- Limited Commercial
- General Commercial
- Community Commercial
- Regional Commercial

**Industrial**

- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Parking

**Open Space, Public Facilities**

- Open Space
- Public Facilities

City Boundary (PLN)

Proposed Addition to Sphere of Influence

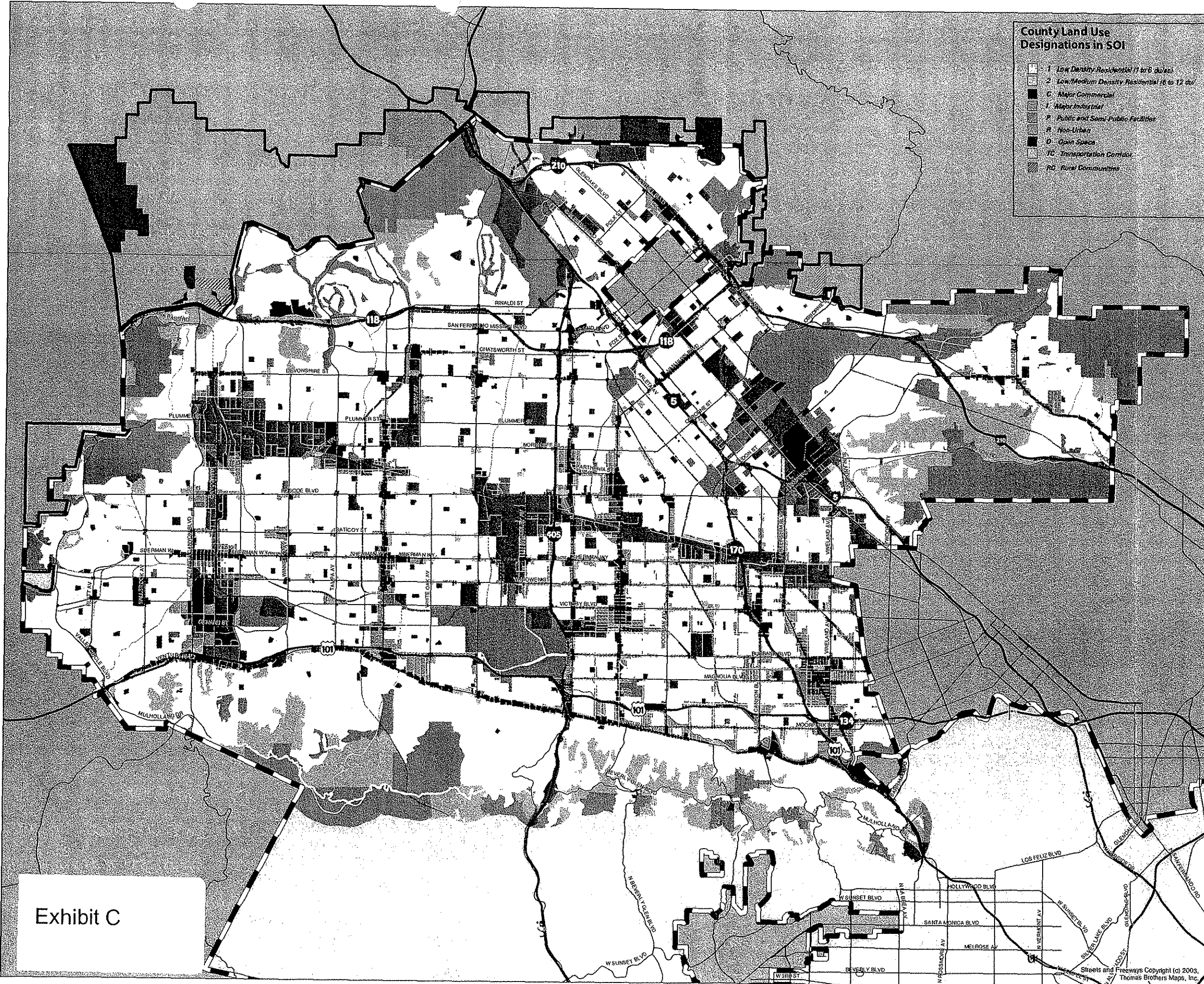


Prepared by the Department of City Planning  
Systems & GIS Division - September 2004

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of the City of Los Angeles

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Exhibit C



Streets and Freeways Copyright (c) 2003,  
Thomas Brothers Maps, Inc.



**Exhibit D: Map of the Rim of the Valley Corridor**

Parklands and Open Space



SANTA MONICA MOUNTAINS CONSERVANCY ZONE - RIM OF THE VALLEY CORRIDOR

**LEGEND**

- County Line
- Proposed Addition to Sphere of Influence
- City Boundary



**SERVING**

L.A., San Fernando Valley, Conejo Valley,  
Simi Valley, Moorpark, Antelope Valley,  
Santa Clarita, Glendale, Burbank

# Daily News

[dailynews.com](http://dailynews.com)

## WEATHER

Mostly sunny  
High: 65-69  
Low: 36-45  
Air quality:  
Moderate

For details, see back of Business

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WEDNESDAY, DECEMBER 15, 2004

50 Cents

# Cities block 5,800 homes



Local governments aim to stop a new minicity in the Newhall Pass

## Las Lomas would cover L.A.-Santa Clarita open space

By Kerry Cavanaugh  
Staff Writer

Los Angeles and Santa Clarita officials have quietly cut a deal to split jurisdiction of 555 acres in the Newhall Pass, effectively blocking the 5,800-home Las Lomas development proposed for the steep hills between the cities.

Leaders from the two cities and Los Angeles County government began meeting last month to air their concerns about the proposed Las Lomas minicity, whose residents would make an estimated 44,000 car trips a day.

Parties involved in the negotiations said they have reached an informal agreement to divide the land along the

edge and impose strict zoning requirements that would prevent Las Lomas from being developed as proposed.

"There did not appear to be any support for Las Lomas by any of the three jurisdictions," said Michael Murphy, Santa Clarita's intergovernmental relations officer. "Las Lomas probably drove

the parties to come together."

Las Lomas developer Dan Palmer did not return calls.

Palmer Investments has been working since 1998 on the plan to build houses, apartments, shopping centers and offices on what is currently unincorporated

Please see LOMAS / Page 24



Should the  
5,800-home  
Las Lomas  
project be  
blocked?

See Page 2

# 5,800 homes blocked

LOMAS / From Page 1

county land between the Golden State and Antelope Valley freeways.

Palmer applied in 2002 to annex the 555 acres to the city of Los Angeles, hoping to tap into the city's plentiful water supply.

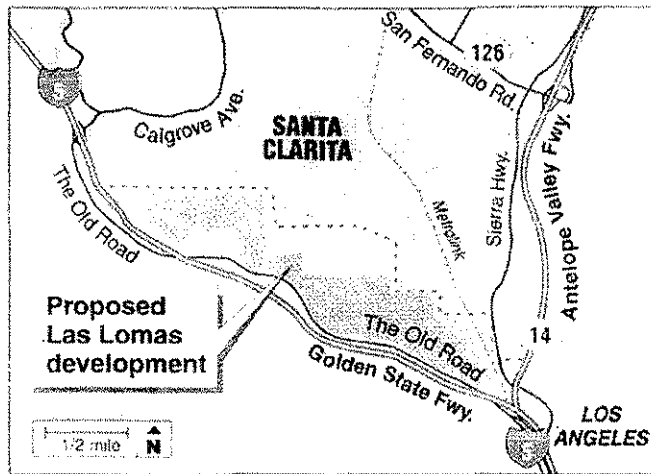
Santa Clarita officials tried to stop Las Lomas by annexing the land before Palmer could make it part of Los Angeles. But a Superior Court judge blocked Santa Clarita's efforts on procedural grounds in April. But meanwhile, Palmer wasn't getting much support from Los Angeles.

Los Angeles City Councilman Greg Smith, who represents a portion of the northern San Fernando Valley, was an early opponent of a Las Lomas minicity.

Council President Alex Padilla, whose district also lies adjacent to the Las Lomas property, decided earlier this year he would not support Las Lomas because it would destroy open space and be difficult to supply with services.

Under the tentative agreement, the two cities would split the Newhall Pass area along the ridgeline. Santa Clarita would annex about 75 percent of the property north of the Santa Susana Mountains and zone it to allow no more than one house per two acres.

Los Angeles would bring the remaining 25 percent of the property into its sphere of influence, giving the city the opportunity to review projects and first



right to annex property within the zone.

Padilla said he wants to maintain that steep land as open space — an option that could further impact Palmer's chances to develop his minicity.

"I don't know technically if Las Lomas is alive or dead," Padilla said Tuesday. "That's up to the developer."

Las Lomas opponents praised the cities' tentative agreement, saying it opens the door to preserving the last open space between Santa Clarita and the city of Los Angeles.

An environmental impact study determined the project would rip out nearly 3,000 oak trees and carve out 20 million cubic yards of dirt. County officials had warned

the land was too steep and unstable for dense housing development.

"It saves us in the environmental community a huge fight as we were gearing up to go to war," said Bart Reed, who was organizing a Stop Las Lomas effort for the Sierra Club's Angeles Chapter.

Los Angeles has already begun work to enlarge its sphere of influence by including roughly 30 square miles of unincorporated area along the northern edge of the San Fernando Valley, from Chatsworth to Lake View Terrace.

However, some San Fernando Valley residents worry that enlarging the Los Angeles sphere of influence will lead to annexation and rampant development on the foothills north of Chatsworth and Porter Ranch.

"I believe Los Angeles wants development there," said Kim Thompson, a Granada Hills activist. "I want the whole ridge-line protected."

"If we don't, it'll be like the Hollywood Hills. It'll grow out of control."

Councilman Smith said designating the sphere of influence will not open the area to growth.

"If anything, it would retard growth. We have much more stringent growth guidelines than the county," Smith said, adding that much of the hilly land north of the city boundary is property owned by The Gas Co. or parkland that will not be developed.

Instead, Smith said, expanding the L.A. sphere of influence would give the city more input on proposed county developments, such as the 375-home Deerlake Ranch north of Chatsworth.

"Without the sphere of influence, we have no place at the table."

The Los Angeles Planning Department recently completed an environmental review on the sphere-of-influence proposal, and the City Council's Planning and Land Use Committee is expected to vote on it in January.

The county's Local Agency Formation Commission, which approves annexations, will ultimately vote on the sphere-of-influence change.

Kerry Cavanaugh, (818) 713-3746  
kerry.cavanaugh@dailynews.com

## [X] Proposed [ ] Final

**PROJECT DESCRIPTION:** The project is an amendment to the City of Santa Clarita's Sphere of Influence to include approximately 595 acres of area in order to establish the probable ultimate boundary of the urban service area of the City of Santa Clarita. A sphere of influence modification is not an annexation, nor does modification to an adopted sphere initiate annexation proceedings. No changes to jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use would ensue as a result of adopting the sphere of influence proposed.

☒ Are Not Required    ☐ Are Attached    ☐ Are Not Attached

CERTIFICATION DATE:



**INITIAL STUDY  
SOUTH SANTA CLARITA  
SPHERE OF INFLUENCE AMENDMENT  
City of Santa Clarita**

**Project Title/Master Case Number:** MC 05-078 - An application to the Los Angeles County Local Agency Formation Commission to Initiate Proceedings for an Amendment to a Sphere of Influence, pursuant to the Cortese-Knox Local Government Reorganization Act of 1985 (Title 5, Division 3, commencing with Section 56000 of the California Government Code).

**Lead Agency name and address:** City of Santa Clarita  
23920 Valencia Blvd., Suite 300  
Santa Clarita, CA 91355

**Contact person and phone number:** Kai Luoma, AICP, Senior Planner  
City of Santa Clarita Department of Planning & Economic Development  
(661) 255-4330

**Project location:** The South Santa Clarita Sphere of Influence Amendment Area is located in the unincorporated area of the County of Los Angeles between the southern boundary of the City and Interstate 5 beginning on the north at the City's boundary and extending south to within approximately ¾ mile of the Interstate 5/State Route 14 interchange. Assessor Parcel Numbers 2827-028-005 through 008, 010, 014, 019, 020, 900 and 2827-029-004, 008, 012, 016, 900 and 2827-036-001, 004, 006 through 014.

**Applicant's name and address:** City of Santa Clarita  
Department of Planning & Economic Development  
23920 W. Valencia Blvd., Suite 300  
Santa Clarita, CA 91355

**General Plan designation:**

The 595-acre Sphere of Influence (SOI) Amendment Area is located in unincorporated County of Los Angeles. County land use designations include: HM (Hillside Management), TC (Transportation Corridor), W (Watershed), and Urban 3 (6.7 to 15 du/ac) under the Los Angeles County's Santa Clarita Valley Areawide General Plan, as shown in **Figure 1**.

**Zoning:**

The subject site is currently located in unincorporated County of Los Angeles. The site is currently zoned as A-2-1 pursuant to Los Angeles County Zoning Code as shown in **Figure 3**.

**Description of project and setting:**

The City is proposing to amend its existing sphere of influence to include the 595-acre site. Existing uses within the project site are described more fully as part of the introduction that follows.

**Surrounding land uses:**

The site abuts the City's boundaries and is located immediately east of Interstate 5 and south and west of the City in unincorporated County of Los Angeles (see **Figure 2**). The property to the north and east is developed and undeveloped large lot residential in City of Santa Clarita. The area to the south of the site is largely undeveloped area with steep topography. I-5 abuts the site to the west.

**Other public agencies whose approval is required:**

Local Agency Formation Commission  
Los Angeles County  
700 North Central Avenue, Suite 350  
Glendale, CA 91203

**A. INTRODUCTION**

The City of Santa Clarita is proposing to amend its existing Sphere of Influence (SOI) to include the 595-acre area which abuts the current City limits to the north and east. As shown in **Figures 2 and 3**, the subject site is generally located in an area between the southern boundary of the City and Interstate 5. The SOI amendment would extend the City's SOI to generally match the watershed ridge which physically separates the Santa Clarita and San Fernando Valleys

A sphere of influence is a plan for the probable, ultimate municipal boundaries and service area of a local agency, as determined by the LAFCO. Upon adoption of a sphere of influence, it is used by the LAFCO as a factor in making determinations and decisions over which it has authority and jurisdiction. Government Code Section 56427 provides that each LAFCO shall adopt a sphere of influence for each local agency under that LAFCO's jurisdiction. Section 56428 provides that any local agency may request an amendment or revision to an adopted

sphere of influence or urban service area. The City of Santa Clarita's sphere of influence was originally determined and adopted by the LAFCO in 1989 and was essentially coterminous with the City's incorporation boundary and encompassed approximately 46.7 square miles. In 2000, a SOI amendment was approved by the LAFCO, which extended the SOI beyond City limits to the north and east. The City's SOI has been amended various other times, including the 1,300-acre Golden Valley Ranch SOI amendment and annexation, the 60-acre Towsley Canyon SOI amendment and annexation, and the 520-acre Whitney Canyon SOI amendment and annexation.

The project evaluated under this initial study is a request to modify the City of Santa Clarita's existing sphere of influence boundary. If approved, the proposed sphere of influence would encompass an additional approximately 595 acres as described above in the initial study's "project location" description.

It should be noted that a sphere of influence modification is not an annexation, nor does modification to an adopted sphere initiate annexation proceedings. No changes to jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, land use designations or zoning would ensue as a result of adopting the sphere of influence proposed.



**FIGURE 1 – SOUTH SANTA CLARITA SOI AMENDMENT AREA EXISTING  
COUNTY LAND USE DESIGNATIONS**

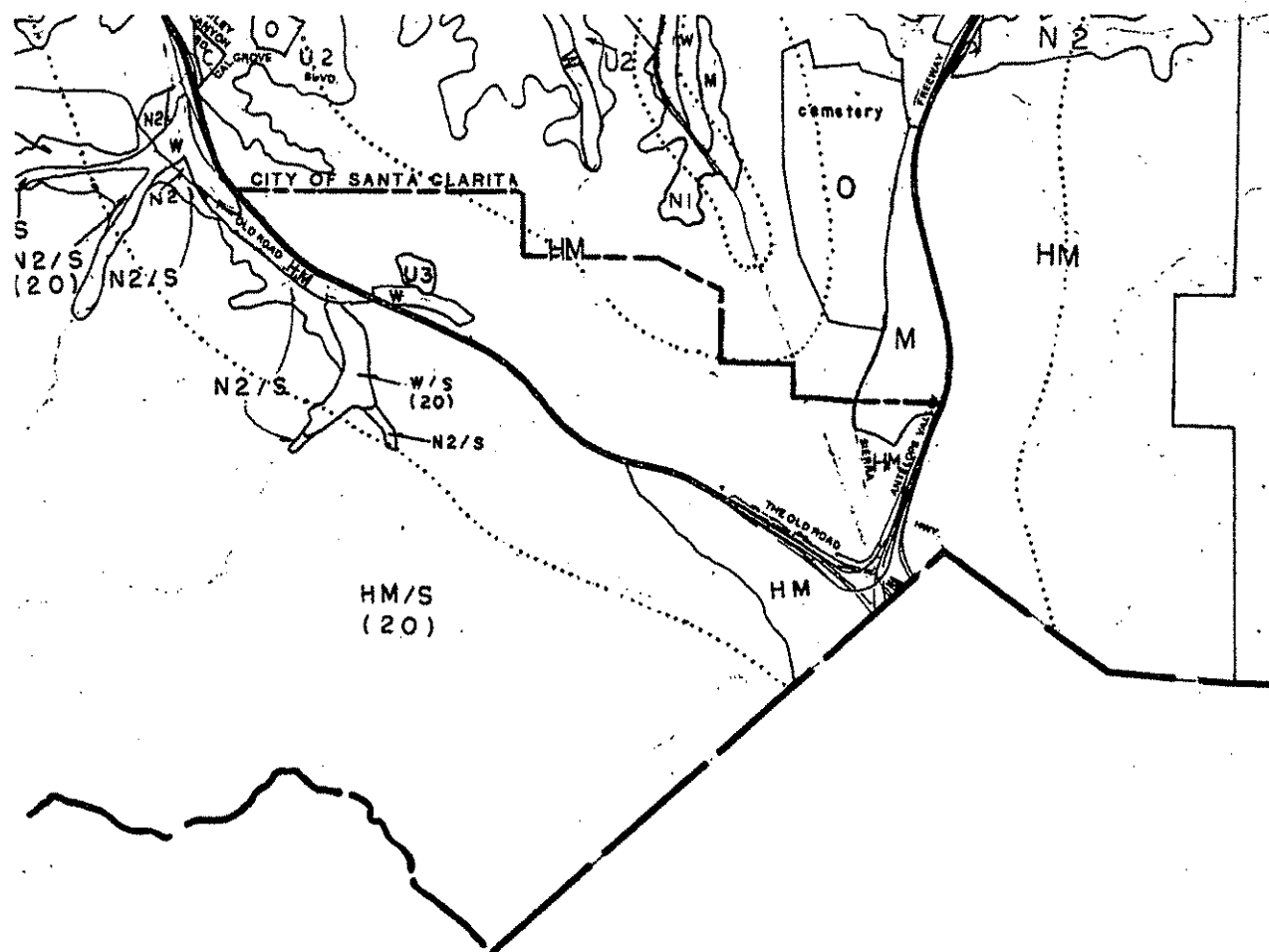
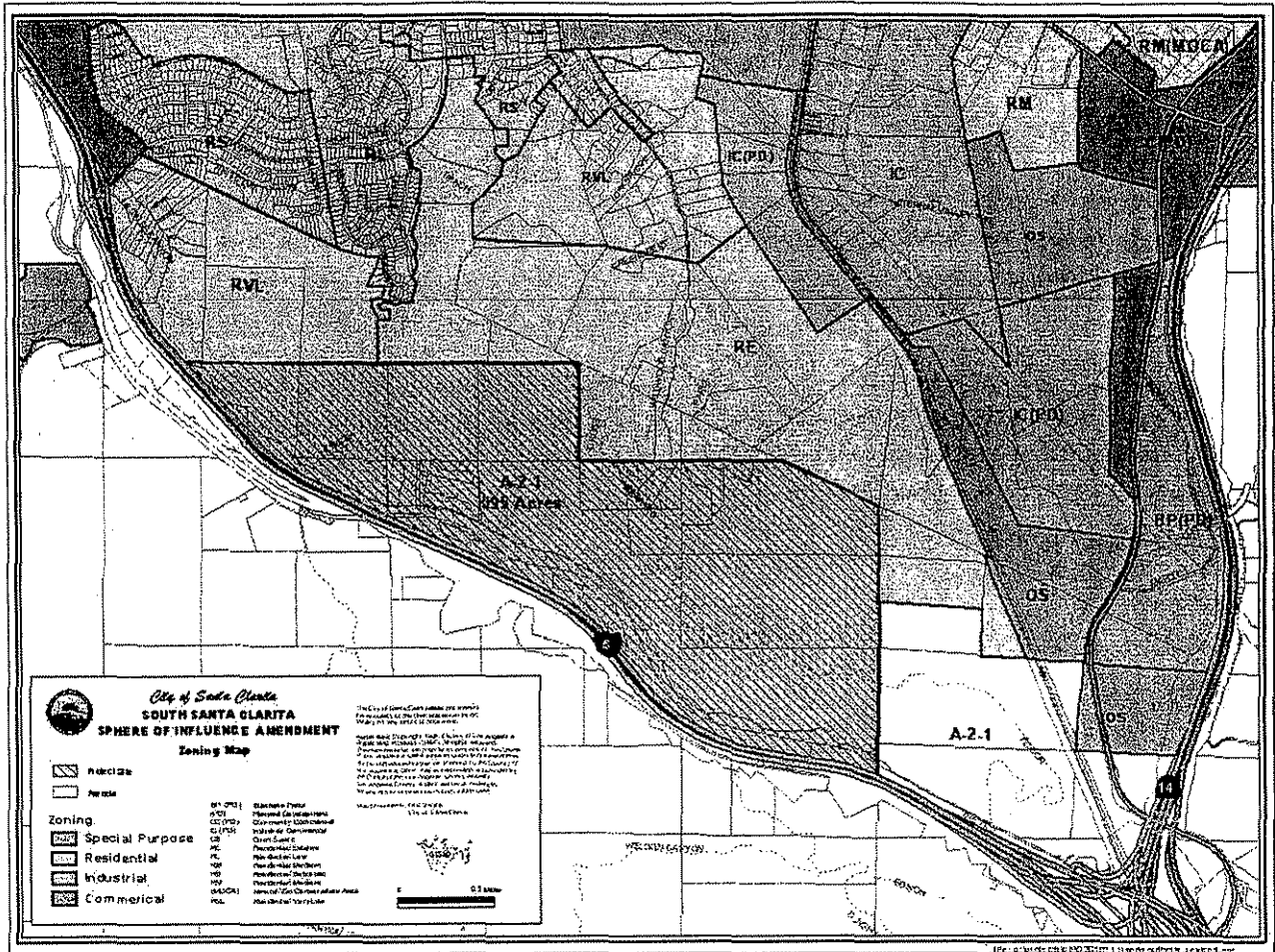




FIGURE 3 – EXISTING ZONING IN AND AROUND SITE



## EXISTING SETTING

The SOI amendment area is currently located wholly within the County of Los Angeles.

A site survey of the area was conducted by City of Santa Clarita staff to provide a more complete description of existing conditions within the area. In addition, staff reviewed aerial photographs of the entire area taken in August 2004. The majority of the site is undeveloped and contains natural grassland, trees, and other flora. The topography consists of moderately to substantially steep hillsides and ridgelines. In addition, the following uses were observed:

### The Old Road (traveling southbound)

- Mobile Home Park – The Crescent Valley Mobile Home Park is located roughly ½ mile south of Towsley Canyon. This park consists of 81 mobile units and a recreation center. The property is situated alongside The Old Road with moderately dense vegetation buffering residences from the highway.
- Single Family Residence (SFR) – The next structure accessible from The Old Road is a single family residence located approximately ¼ mile south of the mobile home park. In order to reach the main structure visitors must drive up a narrow tree lined road (unpaved), which leads to the house. It is important to note that there is a second road, Medford Avenue, which links the SFR with residents living in the northern part of the site.

### Wildwood Canyon Road

- Residential Estates – There are two (2) large residential estates located off of Wildwood Canyon Road. In order to reach the estates, visitors must gain access through a private gate. The area is largely rural and picturesque by most standards, i.e., tree shrouded roads, equestrian trails, expanses of green intermingled with a lush, rustic landscape. Aerial maps indicate that the homes may be accessible via Medford Avenue.
- Grazing Area – Aerial maps show a large clearing located just east of the residential estates. It appears to be used for animal grazing, most likely goats. The clearing is accessible via a private road.

### Miscellaneous

- Towers – various cellular, electric and water towers are located within the site. All are accessible via trail or road.

## Allowable County Development Density

The subject site is located within unincorporated Los Angeles County. The site is currently zoned as A-2-1 pursuant to Los Angeles County Zoning Code. A-2-1 zoning allows for development of up to 1 dwelling unit per acre. Current zoning would allow for development of

up to 595 dwelling units within the subject area, however, development would be limited to that permitted with the underlying general plan designation discussed below.

The County land use designations for the site include TC (Transportation Corridor) and W (Watershed) in limited areas. The 81-unit mobile home park has a County designation of Urban 3, which allows 6.7 to 15 dwelling units per acre. The remainder and majority of the site is designated HM (Hillside Management). The HM designation would limit development in areas with slopes of over 50 percent to 1 dwelling unit per 20 acres. In areas with slopes of less than 50 percent, development would be limited to 1 dwelling unit per 2 acres. The County's current land use designations are estimated to allow for development of up to 290 dwelling units within the site.

## **THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**

This Initial Study and resulting Negative Declaration (ND) for the SOI amendment have been prepared in accordance with the California Environmental Quality Act (CEQA) and the Guidelines for the Environmental Quality Act (Guidelines).

### **Approach Used In Preparing the CEQA Checklist**

The preparation of this initial study focused solely on the potential environmental impacts of the proposed SOI Amendment for the following reasons:

- The project is not associated with an existing or planned annexation. It is strictly an amendment to the City's SOI. The SOI amendment does not include any change in jurisdictional boundaries: the site remains under the jurisdiction of the County. The SOI amendment does not alter any development potential that already exists on the site, nor does it give the City any jurisdiction over development of the property.
- The SOI amendment is not related to any proposed development on the site. Therefore, this initial study does not consider the impacts of speculative development projects that may be proposed on the project site through municipalities having no jurisdiction over the site. Any such speculative development proposal would be processed by the municipality to which the development application was submitted. The municipality having the principal responsibility for approving the proposed development project would also act as lead agency in preparation of the appropriate environmental document (CEQA Guidelines 15367). It is the lead agency's responsibility to determine the direct or reasonably foreseeable indirect environmental impacts of such a project. As the City is the lead agency of only the SOI amendment, potential impacts related only to the SOI amendment are evaluated.

It should also be pointed out that Section 15064(d)(3) of the CEQA Guidelines states that when considering indirect physical changes that are subject to environmental review,

"an indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable."

Consistent with this CEQA section, the City need only evaluate indirect impacts "caused by the project". The project is the SOI amendment and, therefore, only reasonably foreseeable indirect impacts caused by the amendment are evaluated. Because the amendment will not give the City any jurisdiction over the site, any developments proposed at the site are not subject to the City's environmental review.

Because no development is associated with or proposed as part of the City's SOI amendment, there can be no direct physical change to the environment. Because the County retains full jurisdiction over the site and all existing County general plan and zoning designations will continue to be applicable, there can be no reasonably foreseeable indirect environmental impacts of the proposed SOI amendment.

- The SOI amendment has no affect on jurisdictional boundaries and does not give the City jurisdiction over the site. In addition, there will be no change in any public services. Future development proposals on the site would be outside the City's jurisdiction and remain in the County's. The provision of the public services in the area will continue to be the responsibility of the County. It is, therefore, not reasonable to conclude that the City's SOI amendment would result in any direct or foreseeable indirect physical change on the environment.

### **Santa Clarita Valley Area Plan EIR**

The County of Los Angeles prepared a Final Environmental Impact Report for the Santa Clarita Valley Area Plan Comprehensive Update in May 1990. The State Clearinghouse Number is 89010293. The subject site is located in the Plan area. This County-prepared EIR includes the subject site and is referenced in this document. A copy of this FEIR is located in the offices of the City of Santa Clarita Planning and Economic Development Department.

The EIR states that it evaluates the impacts of development of the entire year 2010 housing unit projections. It also states that impacts from all existing and anticipated development based on the Land Use Policy Map were included.

The County of Los Angeles Land Use Policy Map designations for the site include TC (Transportation Corridor) and W (Watershed). The 81-unit mobile home park has a County designation of Urban 3, which allows 6.7 to 15 dwelling units per acre. The remaining majority of the site is designated HM (Hillside Management). The entire site has been zoned A-2-1 (Heavy Agriculture), which allows for development of up to 1 dwelling unit per acre.

By applying the land use designations and zoning to the properties that make up the subject site, the County bestowed upon the properties the right to develop them with a use and at a density that is consistent with the general plan and zoning. The existing designations and zoning permit various agricultural-associated uses "by right". In addition, the land use designations and zoning

also permit residential development "by right". The right to develop the site consistent with the General Plan/zoning has already been granted by the County. The potential development of the site consistent with the development rights granted by the general plan was taken into consideration during the comprehensive update of the Santa Clarita Valley Area Plan. The potential environmental impacts of such development were evaluated in the EIR prepared and adopted for the Area Plan Update.

Due to the fact that the proposed SOI amendment makes no changes to jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, land use, or zoning it cannot and will not have an environmental impact beyond what has been evaluated and certified in the County's EIR. In fact, because no development or future development is proposed or foreseen as part of this SOI amendment, environmental impacts, if any, would be substantially less than those evaluated in the County's EIR. Furthermore, as this document concludes, the City has determined that no environmental impacts will occur as part of this proposal.

#### **B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or a "Potentially Significant Impact Unless Mitigation Measures Incorporated" as indicated by the checklist on the following pages.

- |                                                        |                                                             |                                                 |
|--------------------------------------------------------|-------------------------------------------------------------|-------------------------------------------------|
| <input type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture Resources              | <input type="checkbox"/> Air Quality            |
| <input type="checkbox"/> Biological Resources          | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Geology /Soils         |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality          | <input type="checkbox"/> Land Use / Planning    |
| <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Noise                              | <input type="checkbox"/> Population / Housing   |
| <input type="checkbox"/> Public Services               | <input type="checkbox"/> Recreation                         | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities / Service Systems   | <input type="checkbox"/> Mandatory Findings of Significance |                                                 |

#### **C. DETERMINATION:**

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Prepared by:

|                  |                               |       |
|------------------|-------------------------------|-------|
| Signature/ Title | Kai Luoma, AICP               | Date: |
| Approved by:     | Senior Planner                |       |
| Signature/Title  | Paul Brotzman,                | Date: |
|                  | Director, Planning & Economic |       |
|                  | Development                   |       |



**D. EVALUATION OF ENVIRONMENTAL IMPACTS:**

Potentially Significant Impact    Less Than Significant Impact with Mitigation    Less Than Significant Impact    No Significant Impact

**I. AESTHETICS -- Would the project:**

- |                                                                                                                                                                                        |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Have a substantial adverse effect on a scenic vista?                                                                                                                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Substantially damage scenic resources, including, but not limited to, primary/secondary ridgelines, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings?                                                                                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?                                                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Other _____                                                                                                                                                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**II. AGRICULTURE RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:**

- |                                                                                                                                                                                                                                                |                          |                          |                          |                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?                                                                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?                                                                                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Other _____                                                                                                                                                                                                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Potentially Significant Impact    Less Than Significant Impact with Mitigation    Less Than Significant Impact    No Significant Impact

**III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:**

- |                                                                                                                                                                                                                                                                                            |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Conflict with or obstruct implementation of the applicable air quality plan?                                                                                                                                                                                                            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?                                                                                                                                                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Expose sensitive receptors to substantial pollutant concentrations?                                                                                                                                                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people?                                                                                                                                                                                                                    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Other _____                                                                                                                                                                                                                                                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**IV. BIOLOGICAL RESOURCES -- Would the project:**

- |                                                                                                                                                                                                                                                                                                                  |                          |                          |                          |                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

|                                                                                                                                                                                                                                                                      | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Significant<br>Impact         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?                     | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Oak trees?                                                                                                                       | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?                                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Other _____                                                                                                                                                                                                                                                       | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**V. CULTURAL RESOURCES -- Would the project:**

|                                                                                                               |                          |                          |                          |                                     |
|---------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                                                                                                                        | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Significant<br>Impact         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| c) Directly or indirectly destroy or impact a unique paleontological resource or site or unique geologic feature?                                                                                                                                                                      | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Disturb any human remains, including those interred outside of formal cemeteries?                                                                                                                                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Other _____                                                                                                                                                                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| <b>VI. GEOLOGY AND SOILS – Would the project:</b>                                                                                                                                                                                                                                      |                                      |                                                |                                    |                                     |
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:                                                                                                                                                       | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| ii) Strong seismic ground shaking?                                                                                                                                                                                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| iii) Seismic-related ground failure, including liquefaction?                                                                                                                                                                                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| iv) Landslides?                                                                                                                                                                                                                                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Result in substantial wind or water soil erosion or the loss of topsoil, either on or off site?                                                                                                                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                    | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Significant Impact            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Change in topography or ground surface relief features?                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Earth movement (cut and/or fill) of 10,000 cubic yards or more?                                                                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| h) Development and/or grading on a slope greater than 10% natural grade?                                                                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| i) The destruction, covering or modification of any unique geologic or physical feature?                                                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| j) Other _____                                                                                                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**VII. HAZARDS AND HAZARDOUS MATERIALS - Would the project:**

|                                                                                                                                                                                                                                                                                              |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?                                                                                                                                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving explosion or the release of hazardous materials into the environment (including, but not limited to oil, pesticides, chemicals, fuels, or radiation)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                                                                                                  | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Significant<br>Impact         |
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| d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?                                                                                                      | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?                                                                                                                                        | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?                                             | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| i) Exposure of people to existing sources of potential health hazards (e.g. electrical transmission lines, gas lines, oil pipelines)?                                                                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| j) Other _____                                                                                                                                                                                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**VIII. HYDROLOGY AND WATER QUALITY - Would the project:**

|                                                                         |                          |                          |                          |                                     |
|-------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Violate any water quality standards or waste discharge requirements? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

|                                                                                                                                                                                                                                                                                                                                                                                               | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Significant<br>Impact         |
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| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?                                                                                                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?                                                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?                                                                                                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Otherwise substantially degrade water quality?                                                                                                                                                                                                                                                                                                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?                                                                                                                                                                                                                          | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?                                                                                                                                                                                                                                                                                           | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?                                                                                                                                                                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                                                                                                               | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Impact                        |
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| j) Inundation by seiche, tsunami, or mudflow?                                                                                                                                                                                                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| k) Changes in the rate of flow, currents, or the course and direction of surface water and/or groundwater?                                                                                                                                                                    | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| i) Other modification of a wash, channel creek or river?                                                                                                                                                                                                                      | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| l) Impact Stormwater Management?                                                                                                                                                                                                                                              | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| i) Storm water system discharges from areas for materials storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| ii) Significant environmentally harmful increase in the flow rate or volume of volume of storm water runoff?                                                                                                                                                                  | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| iii) Significant and environmentally harmful increases in erosion of the project site or surrounding areas?                                                                                                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| iv) Storm water discharges that would significantly impair the beneficial uses of receiving waters or areas that provide water quality benefits (e.g. riparian corridors, wetlands, etc.)                                                                                     | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| v) Cause harm to the biological integrity of drainage systems and water bodies?                                                                                                                                                                                               | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| vi) Does the proposed project include provisions for the separation and reuse of materials?                                                                                                                                                                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**IX. LAND USE AND PLANNING - Would the project:**



|                                                                                                                                                                                                                                                                                                             | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Impact                        |
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| a) Disrupt or physically divide an established community (including a low-income or minority community)?                                                                                                                                                                                                    | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Conflict with any applicable habitat conservation plan, natural community conservation plan, and/or policies by agencies with jurisdiction over the project?                                                                                                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Affect a Significant Ecological Area (SEA)?                                                                                                                                                                                                                                                              | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

**X. MINERAL AND ENERGY RESOURCES - Would the project:**

|                                                                                                                                                                       |                          |                          |                          |                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Use nonrenewable resources in a wasteful and inefficient manner?                                                                                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XI. NOISE - Would the project result in:**

|                                                                                                                                                                                     |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

|                                                                                                                                                                                                                                                                     | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Significant<br>Impact         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                             | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                                      | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                          | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?                                                                                                      | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

## **XII. POPULATION AND HOUSING - Would the project:**

|                                                                                                                                                                                                           |                          |                          |                          |                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere (especially affordable housing)?                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?                                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

## **XIII. PUBLIC SERVICES**

Potentially Significant Impact    Less Than Significant Impact with Mitigation    Less Than Significant Impact    No Significant Impact

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- |                        |                          |                          |                          |                                     |
|------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| i) Fire protection?    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii) Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iii) Schools?          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iv) Parks?             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

#### XIV. RECREATION -

- |                                                                                                                                                                                                                |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

#### XV. TRANSPORTATION/TRAFFIC - Would the project:

- |                                                                                                                                                                                                                                                                                        |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

|                                                                                                                                                                                                        | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Significant<br>Impact         |
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| b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?                                   | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?                                        | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?                                                 | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Result in inadequate emergency access?                                                                                                                                                              | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Result in inadequate parking capacity?                                                                                                                                                              | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?                                                                       | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| h) Hazards or barriers for pedestrians or bicyclists?                                                                                                                                                  | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| <b>XVI. UTILITIES AND SERVICE SYSTEMS - Would the project:</b>                                                                                                                                         |                                      |                                                |                                    |                                     |
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?                                                                                                    | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?          | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                                                                   | Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Impact                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------|------------------------------------|-------------------------------------|
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?                                                                                                            | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste?                                                                                                                                         | <input type="checkbox"/>             | <input type="checkbox"/>                       | <input type="checkbox"/>           | <input checked="" type="checkbox"/> |

#### **XVII. MANDATORY FINDINGS OF SIGNIFICANCE.**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

| Potentially<br>Significant<br>Impact | Less Than<br>Significant<br>with<br>Mitigation | Less Than<br>Significant<br>Impact | No<br>Significant<br>Impact |
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- |                                                                                                                                             |                          |                          |                          |                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

**E. DISCUSSION OF ENVIRONMENTAL IMPACTS AND/OR EARLIER ANALYSIS:**

| Section and Subsections          | Evaluation of Impacts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>I. AESTHETICS</b>             | <p><b>(a) – (e) No Significant Impact</b></p> <p>The sphere of influence proposed by the City of Santa Clarita is solely a plan for the future municipal boundaries and service area of that local agency. No changes to existing jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use would ensue as a result of adopting the sphere of influence proposal. No development is being proposed as part of the project, nor could be as the site remains the jurisdiction of the County of Los Angeles. Because the site will remain under the jurisdiction of the County, no development potential beyond what currently exists and was evaluated by the County's EIR prepared for the Santa Clarita Valley Area Plan Comprehensive Update could occur. Any such development would remain under the purview of the County. Therefore no negative environmental impacts to aesthetics are anticipated with the SOI amendment.</p> <p>No mitigation is required.</p>                                                                                                                                                                                                                                          |
| <b>II. AGRICULTURE RESOURCES</b> | <p><b>(a) – (d) No Significant Impact</b></p> <p>The sphere of influence proposed by the City of Santa Clarita is solely a plan for the future municipal boundaries and service area of that local agency. No changes to existing jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use would ensue as a result of adopting the sphere of influence proposal. No development is being proposed as part of the project, nor could be as the site remains the jurisdiction of the County of Los Angeles. Because the site will remain under the jurisdiction of the County, no development potential beyond what currently exists and was evaluated by the County's EIR prepared for the Santa Clarita Valley Area Plan Comprehensive Update could occur. Any such development would remain under the purview of the County. Therefore no negative environmental impacts to aesthetics are anticipated with the SOI amendment.</p> <p>Because the project does not propose jurisdictional changes or changes to land use or zoning designations on properties, the modifications to the applicant's sphere of influence boundary will not result in the conversion of Prime Farmland, Unique Farmland, or</p> |

|                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                 | <p>Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural uses. The project will not conflict with existing zoning for agricultural use or conflict with a Williamson Act contract, nor will the project involve other changes in the existing environment which could result in conversion of Farmland to non-agricultural use. No impacts to agricultural resources are anticipated.</p> <p>No mitigation is required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>III. AIR QUALITY</b>         | <p><b>(a) – (f) No Significant Impact</b></p> <p>A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. The proposal to modify the City of Santa Clarita's current sphere of influence boundary will not create negative impacts to air quality within the Santa Clarita Valley.</p> <p>No development is being proposed in conjunction with the proposal to modify the existing sphere of influence boundary. Therefore, the project will not violate any air quality standard or contribute to an existing or projected air quality violation. The project will not expose sensitive receptors to pollutants, nor will the project create objectionable odors.</p> <p>Because the proposal consists solely of modifications to an existing sphere of influence boundary and does not propose any specific or general development, <del>no negative environmental impacts</del> to air quality are anticipated. No mitigation is required.</p> |
| <b>IV. BIOLOGICAL RESOURCES</b> | <p><b>(a) – (g) No Significant Impact</b></p> <p>A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. The proposal to modify the City of Santa Clarita's current sphere of influence boundary will not negatively impact biological resources within the Santa Clarita Valley.</p> <p>The project proposes modification to an existing sphere of influence boundary for the City of Santa Clarita, and does not propose development. Therefore, the proposal will not result in impact to endangered, threatened or rare species or their habitats, including but not limited to plant, fish, insect, animal, and/or bird habitats. The proposal does not propose the removal of oak trees, will not affect any wetland habitat or blueline stream, and will not create negative impacts to wildlife dispersal or migration corridors.</p>                                                                                                    |



|                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              | <p>The proposal includes an amendment to the City of Santa Clarita's current sphere of influence boundary, and does not propose development. Therefore, no negative environmental impacts to biological resources are anticipated. No mitigation is required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>V. CULTURAL RESOURCES</b> | <p><b>(a) – (e) No Significant Impact</b></p> <p>A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. The proposal to modify the City of Santa Clarita's current sphere of influence boundary will not negatively impact cultural resources within the Santa Clarita Valley.</p> <p>Because no development is being proposed by the applicant, the project does not have the potential to disturb paleontological or archaeological resources, does not have the potential to cause a physical change which would affect unique ethnic cultural values, will not restrict existing religious or sacred uses within the project boundary or beyond, nor will it affect a recognized historical site.</p> <p>The applicant's project consists solely of modifications to an existing sphere of influence boundary, and does not propose development. Therefore, no negative environmental impacts to cultural resources are anticipated. No mitigation is required.</p>                                                                            |
| <b>VI. GEOLOGY AND SOILS</b> | <p><b>(a) – (j) No Significant Impact</b></p> <p>A sphere of influence is a planning tool or guide for the probable, ultimate municipal boundary and municipal service area of a local governmental agency. The proposal to modify the City of Santa Clarita's current sphere of influence boundary will not create physical changes to the geology of the Santa Clarita Valley.</p> <p>No unstable earth conditions or changes to geologic substructures will result as part of this proposal. Modifications to the applicant's current sphere of influence boundary will not create disruptions, displacements, compaction or over covering of soils, will not change topography or ground surface relief features, will not result in the destruction, covering or modification of any unique geologic or physical features of the area, and will not increase wind or water erosion of soils (either on or off the project site).</p> <p>The southern California area is prone to earthquake activity, and therefore the residents of the area are currently exposed to geologic hazards. Modification to the applicant's sphere of influence</p> |

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|                                                    | <p>boundary will not increase the already-existing exposure of people or property to geologic hazards, such as earthquakes, landslides, mudslides, ground failure, or similar hazards.</p> <p>Modification to the applicant's current sphere of influence boundary will not create changes in deposition, erosion, or siltation of soils, will not modify any wash, channel, creek or river, and will not involve the movement of earth materials. The project does not propose development of any sort, and therefore will not involve development and/or grading on slopes greater than 25% natural grade, and will not involve development within any Alquist-Priolo Special Studies zone.</p> <p>No negative environmental impacts to geology are anticipated due to the proposed modification of the applicant's sphere of influence boundary, and therefore no mitigation is required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p><b>VII. HAZARDS AND HAZARDOUS MATERIALS</b></p> | <p><b>(a) – (j) No Significant Impact</b></p> <p>A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. The proposal to modify the City of Santa Clarita's current sphere of influence boundary will not create hazards within the Santa Clarita Valley nor will the project involve the use, storage, or transfer of hazardous materials.</p> <p>The sphere of influence amendment does not include development proposals. Therefore, the project will not result in a risk of accidental explosion or release of hazardous substances (including oil, pesticides, chemicals or radiation), will not interfere with an emergency response plan or emergency evacuation plan, and will not create any health hazard or potential health hazard. Since no development is being proposed, the sphere of influence amendment will not increase fire hazards in areas with flammable brush, grass, or trees.</p> <p>Certain portions of the residential population in the Santa Clarita Valley are currently exposed to potential health hazards, such as electrical transmission lines, gas lines, and oil pipelines. The applicant's proposal to modify an existing sphere of influence boundary will not increase the currently-existing exposure of certain populations to potential health hazards as listed above.</p> <p>Because the applicant's project consists solely of modifications to an existing sphere of influence boundary, and does not include development proposals, no negative environmental impacts related to</p> |

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|                                          | hazards are anticipated. No mitigation is required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>VIII. HYDROLOGY AND WATER QUALITY</b> | <p><b>(a) – (i) No Significant Impact</b></p> <p>A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. The proposal to modify the City of Santa Clarita's current sphere of influence boundary will not create changes to water within the Santa Clarita Valley.</p> <p>Because the project consists solely of changes to the applicant's current sphere of influence boundary, no changes in water absorption rates, drainage patterns, or the rate and amount of surface runoff will occur. The project will not expose people or property to water-related hazards (such as flooding), will not create new or alter existing water discharge into surface waters or other alterations of surface water quality (e.g. temperature, dissolved oxygen, or turbidity), nor will the project create changes in the amount of surface water in any water body.</p> <p>Modifications to the City of Santa Clarita's current sphere of influence boundary will not change water currents, or the course of direction of water movements. The project will not change the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations, or through substantial loss of groundwater recharge capability.</p> <p>The project's proposal to modify the applicant's current sphere of influence boundary will not alter the direction or rate of flow of groundwater, impact groundwater quality, or create a substantial reduction in the amount of groundwater otherwise available for public water use.</p> <p>No negative environmental impacts to water are anticipated due to the proposed modification of the applicant's sphere of influence boundary, and therefore no mitigation is required.</p> |
| <b>IX. LAND USE AND PLANNING</b>         | <p><b>(a) – (d) No Significant Impact</b></p> <p>The sphere of influence proposed by the City of Santa Clarita is a plan for the future municipal boundaries and service area of that local agency. No changes to General Plan land use designations or zoning, either within the County of Los Angeles or the City of Santa Clarita, would occur as a result of adopting the proposed sphere of influence boundary. Therefore, the project will not conflict with general plan</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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|  | <p>designations or zoning, nor will the project be incompatible with existing land use in the City or County.</p> <p>No environmental plans or policies will be altered due to modifications of the City's currently-existing sphere of influence boundary, nor will changes occur to jurisdictional authority. California Government Code Sections 65919-65919.12 do regulate interagency referrals, and dictate that the planning review area for a city includes the area within the sphere of influence of that city. Therefore, an increase to the City's sphere of influence area would formalize a procedure for referral by the County to the City of proposed actions, and for comment upon proposals, within the unincorporated area. If the City and the County do not reach mutual agreement upon a procedure for referrals, the procedures prescribed by Chapter 4.4 of the California Planning, Zoning and Development Laws (see government code sections listed above) will prevail.</p> <p>Although procedures for interagency referrals would change, the currently-existing jurisdictional authority for projects within the unincorporated area would remain with the County of Los Angeles. Therefore, the project will not conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project, as no changes to either jurisdictional authority or applicable policies/plans will occur due to modifications of the City's existing sphere of influence boundary.</p> <p>The proposed modification to the City's sphere of influence boundary will not disrupt or divide the physical arrangement of established communities. A sphere of influence does not necessarily result in annexation of land into the City of Santa Clarita. Twenty-five annexations into the City have occurred since the City's incorporation, all of which were driven by property owners: the City's policy is to annex properties whose owners initiate such proceedings, and changes to that policy are not anticipated. Annexation proceedings are currently governed by the Cortese-Knox Act, with such act limiting annexations not supported by a majority of the property owners involved. The Cortese-Knox act also requires annexing properties not wholly under City ownership to have a contiguous boundary with the City. Therefore, no disruption or division to the physical arrangement of established communities is anticipated.</p> <p>Because the project does not propose changes to land use or zoning designations on properties, the modifications to the applicant's sphere of influence boundary will not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance</p> |
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|                                        | <p>(Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to non-agricultural uses. The project will not conflict with existing zoning for agricultural use or conflict with a Williamson Act contract, nor will the project involve other changes in the existing environment which could result in conversion of Farmland to non-agricultural use. No impacts to agricultural resources are anticipated.</p> <p>Because the project proposes modifications to the City of Santa Clarita's existing sphere of influence boundary, and does not propose changes to general plan designations, zoning designations or land use, <b>no negative environmental impacts</b> to land use are anticipated, and therefore no mitigation is required.</p>                                                                                                                                                                                                                                                                                                    |
| <b>X. MINERAL AND ENERGY RESOURCES</b> | <p><b>(a) – (d) No Significant Impact</b></p> <p>The sphere of influence proposed by the City of Santa Clarita is a plan for the future municipal boundaries and service area of that local agency. No development is being proposed with this project, and therefore no negative environmental impacts to energy and mineral resources are anticipated.</p> <p>The sphere of influence proposal does not include modifications to existing energy conservation policies. Therefore, the project will not conflict with adopted energy conservation plans. The project will not result in the use of nonrenewable resources in a wasteful and/or inefficient manner, nor will the project result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State.</p> <p>The project consists of modifications to the City of Santa Clarita's current sphere of influence boundary, and does not include any development proposals. <b>No negative environmental impacts</b> to energy and/or mineral resources are anticipated. No mitigation is required.</p> |
| <b>XI. NOISE</b>                       | <p><b>(a) – (f) No Significant Impact</b></p> <p>The sphere of influence proposed by the City of Santa Clarita is a plan for the future municipal boundaries and service area of that local agency. No development is being proposed with this project, and therefore no negative environmental impacts to noise are anticipated.</p> <p>Because no development is being proposed, the project will not result in increases to existing noise levels, nor will the project expose people to severe noise levels or vibration.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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|                                           | <p>The applicant's proposal to modify an existing sphere of influence boundary will not result in negative environmental impacts related to noise. Mitigation measures are not required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p><b>XII. POPULATION AND HOUSING</b></p> | <p><b>(a) – (c) No Significant Impact</b></p> <p>The project proposes to modify the City of Santa Clarita's existing sphere of influence boundary, in order to identify the probable, ultimate municipal boundary of the municipality. No jurisdictional changes will result, and therefore the populations of affected jurisdictions will not be modified as a result of this proposal.</p> <p>The proposed project will not modify regional or local population projections, which are currently provided by the Southern California Association of Governments (SCAG) for the North Los Angeles County area. No official regional or local population projections will be exceeded.</p> <p>The project will not create a net loss of jobs, as the proposal seeks only to modify the current sphere of influence boundary for the City of Santa Clarita. No loss of jobs is anticipated.</p> <p>The project will not displace existing housing, especially affordable housing, as the proposal to modify the sphere of influence boundary will not modify existing housing stock.</p> <p>No negative environmental impacts to population and housing are anticipated due to the proposed sphere of influence boundary modification, and therefore no mitigation is required.</p> |
| <p><b>XIII. PUBLIC SERVICES</b></p>       | <p><b>(a) No Significant Impact</b></p> <p>The sphere of influence proposed by the City of Santa Clarita is a plan for the future municipal boundaries and service area of that local agency. It does not change jurisdictional boundaries nor provision of public services. No development or change in public services are being proposed with this project, and therefore no negative environmental impacts to public services are anticipated.</p> <p>The City of Santa Clarita currently provides a full range of urban services to the residents within its corporate limits. These services are rendered directly by the City, indirectly through various contracts and agreements with other agencies, or by service providers doing business in the city and Santa Clarita Valley. The City has contracted with the County of Los Angeles for certain services. Contracting for</p>                                                                                                                                                                                                                                                                                                                                                                                       |

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|  | <p>services has proved to be an effective method of providing service provisions for newer municipalities and is widely used throughout the California.</p> <p>The City of Santa Clarita has contracted with the Los Angeles County Sheriff's Department for police service and the Los Angeles County Fire Department for fire and paramedic service within its municipal boundaries. These agencies also serve the surrounding unincorporated area of Los Angeles County. No negative impacts to fire or police protection are anticipated.</p> <p>Elementary school service is provided throughout the Santa Clarita Valley by four districts: the Castaic Union Elementary School District, the Saugus Union Elementary School District, the Newhall Elementary School District, and the Sulphur Springs Elementary School District. Secondary and high school educational services are provided by the William S. Hart Union High School District for the Santa Clarita Valley. The school districts mentioned above have individual boundaries that run irrespective to the current municipal boundaries. None of the school district boundaries or services would be modified as a result of the City's proposed sphere of influence amendment, and therefore no negative impacts to school services are anticipated.</p> <p>In 1991, the City developed its first Capital Improvement Program (C.I.P) plan. The C.I.P. provides a guide for short- and long-range capital acquisition and development, is updated annually, and has been implemented by the City over the last eight years. Individually developed as a plan of action to properly maintain the existing infrastructure in a sound physical condition, the C.I.P also provides for new facilities to support future development and growth within the City limits. Infrastructure maintenance within the unincorporated area of the Santa Clarita Valley will remain the responsibility of Los Angeles County if the applicant's sphere of influence amendment is approved.</p> <p>Currently, full planning, building, parks and recreation, engineering services, and infrastructure maintenance are provided by the City to its residents. No changes to these services provided are anticipated due to the proposed modifications to the City of Santa Clarita's sphere of influence boundary.</p> <p>When Santa Clarita's ability to deliver services is jurisdictionally or otherwise constrained, the City has joined the planning efforts of public and private service providers. City and school district officials work together, and the City involves itself in coordinating with Los</p> |
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|                               | <p>Angeles County on circulation planning and infrastructure improvements in the City and unincorporated areas. Joint traffic modeling efforts between the City and the County are already in place, with both jurisdictions operating jointly under the Santa Clarita Valley Consolidated Traffic Model.</p> <p>It should be noted that most existing service infrastructure and facilities in the Santa Clarita Valley are located within the City of Santa Clarita. State and regional transportation routes are adjacent to the City and many secondary highways converge and intersect in the City, then radiate out to the canyons and communities beyond. Water, sewer, power, gas, communication, and other utility lines follow a similar pattern. County service facilities, including the Santa Clarita Valley Civic Center, are located in the City of Santa Clarita, as are many state and federal offices.</p> <p>The sphere of influence proposed by the applicant will not modify existing public services. No negative impacts related to public services are anticipated, and therefore no mitigation is required.</p>                                                                                                                                                                                          |
| <p><b>XIV. RECREATION</b></p> | <p><b>(a) – (b) No Significant Impact</b></p> <p>The sphere of influence proposed by the City of Santa Clarita is a plan for the future municipal boundaries and service area of that local agency. There will be no change in jurisdiction or public services provisions. No development is being proposed with this project, and therefore no negative environmental impacts to recreation are anticipated.</p> <p>Because no development is being proposed as part of this project, the modifications to the City of Santa Clarita's existing sphere of influence boundary will not result in an impact upon the quantity of existing recreation opportunities.</p> <p>The proposed sphere of influence amendment will not result in changes to jurisdictional authority, and therefore the quantity of parks and recreation services provided within the amended sphere area would remain under the direct influence of the County of Los Angeles. The proposal will therefore not result in an impact to the quantity of existing recreation opportunities currently provided throughout the Santa Clarita Valley.</p> <p>The City of Santa Clarita's proposal to amend their existing sphere of influence boundary will not create a negative environmental impact to recreation. Mitigation measures are not required.</p> |



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| <p><b>XV. TRANSPORTATION / TRAFFIC</b></p>       | <p><b>(a) – (h) No Significant Impact</b></p> <p>The sphere of influence proposed by the City of Santa Clarita is a plan for the future municipal boundaries and service area of that local agency. No development is being proposed with this project, and therefore no impacts to transportation and/or circulation are anticipated.</p> <p>Since the project is not proposing any development, no increased vehicle trips or traffic congestion will occur. The project will not create hazards to safety from design features (e.g. sharp curves or dangerous intersections) or incompatible uses. The project will not create inadequate emergency access or access to nearby uses, nor will the proposal create insufficient parking capacity within the project area or elsewhere.</p> <p>No hazards or barriers for pedestrians or bicyclists will be created due to the proposal to modify the City of Santa Clarita's current sphere of influence boundary. The project will not conflict with adopted policies supporting alternative transportation, and will not create a disjointed pattern of roadway improvements.</p> <p>Because the project consists of modifications to an existing sphere of influence boundary, does not propose development, and does not change existing policies or jurisdictional authority, no negative impacts to transportation and/or circulation are anticipated. Mitigation measures are not required.</p> |
| <p><b>XVI. UTILITIES AND SERVICE SYSTEMS</b></p> | <p><b>(a) – (g) No Significant Impact</b></p> <p>A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. There will be no change in jurisdictional authority or provision of public services, utilities, or service systems. The proposal to modify the City of Santa Clarita's current sphere of influence boundary will not negatively impact utilities within the Santa Clarita Valley.</p> <p>Because the proposal is limited to modifying the existing sphere of influence, and does not propose development, the project will not create a need for new systems or supplies, or substantial alterations to the following: power or natural gas, communications systems, local or regional water treatment or distribution facilities, sewer or septic tanks, storm water drainage, solid waste disposal, or either local or regional water supplies.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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|                                                 | <p>Most existing service infrastructure and facilities in the Santa Clarita Valley are located within the City of Santa Clarita. State and regional transportation routes are adjacent to the City and many secondary highways converge and intersect in the City, then radiate out to the canyons and communities beyond. Water, sewer, power, gas, communication, and other utility lines follow a similar pattern, and are extended by the applicable utility companies to serve unincorporated areas as development occurs.</p> <p>The proposal to modify the existing sphere of influence boundary will not create negative environmental impacts to utilities. No mitigation is required.</p>                                                                     |
| <b>XVII. MANDATORY FINDINGS OF SIGNIFICANCE</b> | <p><b>(a) – (c) No Significant Impact</b></p> <p><b><u>No Physical Change In the Environment</u></b> - Since there is no annexation or development proposal associated with the South Santa Clarita SOI amendment, no direct physical change in the environment will result from the proposed SOI amendment. Similarly no indirect physical change in the environment would result, since no development proposal which would result in the direct alteration of the physical environment, which would then in turn produce indirect effects, is associated with the amendment. Furthermore, no jurisdictional changes will occur. The County retains full jurisdiction over the site. Any future development on the site would be under the purview of the County.</p> |



## Wong, Joyce

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**From:** Wong, Joyce  
**Sent:** Tuesday, April 26, 2005 12:39 PM  
**To:** Dan Palmer (dpalmer@palmerinvestments.com); Jerold Neuman (jneuman@allenmatkins.com)  
**Cc:** Hall, Carlyle W.  
**Subject:** Draft Las Lomas letter to Santa Clarita re proposed SOI amendment and ND

Greetings,

Carlyle asked me to email you the attached draft letter to Santa Clarita on his behalf for your review and approval. Once you have approved this draft, it will be ready to be sent as a working draft to the Los Angeles City Attorneys. Then, the working draft will need further edits before we send it to Santa Clarita with the exhibits attached. Carlyle also suggests that Las Lomas consider preparing two supporting declarations -- a first one by Dan Palmer that describes how much money Las Lomas has already spent on the Project, and a second one by an EIR planner from the Las Lomas Project consulting team to detail the planning concerns and environmental issues as summarized at pp. 10-12 of this draft letter. Please email or call me with any comments or suggested edits.

Regards,  
Joyce



05-04-26 CWH  
letter Santa Clar...

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May 8, 2005

VIA OVERNIGHT MAIL

Santa Clarita City Council  
City of Santa Clarita  
23920 Valencia Boulevard  
Santa Clarita, CA 91355

Re: Master Case Number MC05-078 (Sphere of Influence Amendment/Negative Declaration); City Council Meeting May 10, 2005

Dear Council Members:

This firm represents the Las Lomas Land Company ("Las Lomas"), developer of the Las Lomas Specific Plan project (the "Las Lomas Project"), which proposes annexation of the Project area into the City of Los Angeles. The 555-acre Las Lomas Project site is situated in a presently unincorporated area between Santa Clarita to the north and Los Angeles to the south.

During 2003-2004, this firm also represented Las Lomas in a Superior Court litigation brought by Las Lomas under the California Environmental Quality Act ("CEQA") challenging certain discretionary actions by Santa Clarita – the approval of a proposed Sphere of Influence Amendment, Annexation and a Pre-zoning – that were designed to initiate and implement Santa Clarita's control over the Las Lomas Project area. That CEQA litigation resulted in the Superior Court's April 13, 2004 writ of mandate ordering Santa Clarita to set aside its discretionary actions, because Santa Clarita had improperly approved those actions based on a mere Negative Declaration ("ND"). The Court specifically ordered Santa Clarita to prepare a full Environmental Impact Report ("EIR") in any further processing of discretionary actions seeking to gain control and authority over the Las Lomas Project area. Now, despite the Superior Court's decision and mandate, Santa Clarita is proposing to process, based on yet another mere ND and without the mandated EIR, one of the same discretionary approvals that the Court had previously set aside – the sphere of influence amendment.

This letter explains how Santa Clarita's CEQA environmental processing of the newly proposed Sphere of Influence Amendment blatantly flies in the face of the 2004 Superior Court order, thus running a serious risk of placing Santa Clarita and its Council members in contempt of that order. Indeed, the current ND is largely a carbon copy of the ND that Judge Dzintra Janavs ruled legally inadequate in the 2003-2004 Court proceedings, and it repeats the same fundamental errors that rendered Santa Clarita's earlier environmental review fatally defective.

A brief summary of the earlier proceedings, juxtaposed against the current proceedings, easily demonstrates the profound errors that Santa Clarita is again making.

## **BACKGROUND**

### **A. In Mid-2002, Los Angeles Launched Its Administrative Proceedings to Establish Jurisdiction and Gain Control over the Las Lomas Project Area.**

In June 2002, Los Angeles circulated a Notice of Preparation ("NOP") of an "EIR" for the Las Lomas Project. The NOP plainly indicated that Las Lomas was requesting, *inter alia*, the following discretionary actions by Los Angeles: Sphere of Influence Amendment, Annexation, General Plan Amendment, Zone Change and Specific Plan approval. Through these requested discretionary actions, Los Angeles would first gain control over the Las Lomas Project area, and then would provide entitlements for a requested mixed use project proposing 5,800 dwelling units, 2.3 million square feet of office/research and development, a 300-room hotel, 225,000 square feet of retail uses, 250,000 square feet of community facilities (including public schools), and 285 acres of open space. (See Exhibit A – Los Angeles' June 27, 2002 NOP materials.)

Responding to the NOP, Santa Clarita submitted detailed comments demanding that Los Angeles' EIR evaluate a host of environmental issues. The Santa Clarita City Council then adopted a resolution proclaiming that "any development in the Las Lomas Project area will have a significant environmental impact..." and alleged, among other matters, that any development could result in potentially significant impacts to the subject parcel's Significant Ecological Area and its wildlife corridor resources, cultural resources, wetlands, steep slopes, earthquake fault lines and wildland fire hazard areas. (See Exhibit B – Santa Clarita's August 9, 2002 comments on Los Angeles' NOP, Exhibit C – Santa Clarita City Council Resolution No. 02-175 dated December 10, 2002; *see also* Exhibit I – the Superior Court's April 13, 2004 Statement of Decision, at p. 3 [citing the above-quoted Santa Clarita City Council resolution statement].)

### **B. In Late-2002, Santa Clarita Launched Administrative Proceedings to Implement Its Own Rival Proposal to Gain Control over the Las Lomas Project Area.**

In December 2002, Santa Clarita decided that it would like to gain control over the Las Lomas Project area and downzone it dramatically, thereby preventing anything close to the intensity of development proposed by Las Lomas. Accordingly, Santa Clarita proposed to undertake the following discretionary actions: a Sphere of Influence Amendment, an Annexation and a Pre-zone. (See Exhibit D – Santa Clarita's December 17, 2002 ND, at p. 1, 2 [providing its

proposed project description including a sphere of influence plan amendment].) These actions were proposed for an 825-acre area that included the proposed 555-acre Las Lomas Project parcel. (See Exhibit E – Santa Clarita Planning and Building Services’ December 10, 2002 agenda report to the City Council, at pp. 1-2, 5; *see also* Exhibit D, at p. 2.) Repudiating its own earlier representations that any development within the Las Lomas Project area would necessarily have significant environmental impacts, Santa Clarita proposed to take these discretionary actions based on a mere ND, rather than a full EIR. In fact, Santa Clarita’s ND repeatedly took the position that its proposal to gain control over the Las Lomas Project area was not “linked” to any particular development proposal; that Las Lomas’ development proposal pending before the Los Angeles decision-makers was purely speculative; and that, absent a particular development proposal by Las Lomas to Santa Clarita, no development at the site was “reasonably foreseeable” and, consequently, no impacts of such development had to be evaluated. (See Exhibit F – Santa Clarita’s February 4, 2003 ND.)

For its part, Las Lomas duly informed Santa Clarita that it “intends to promptly and diligently develop the Las Lomas site regardless of what jurisdiction may govern the site.... Consequently, site development is not only foreseeable, it is imminent.” (See Exhibit G – February 25, 2004 comment letter from Allen Matkins, on behalf of Las Lomas, regarding Santa Clarita’s proposed ND.) Nonetheless, on February 25, 2003, Santa Clarita approved the proposed discretionary actions based on its mere ND, and forthwith presented its actions to the Los Angeles County Local Agency Formation Commission (“LAFCo”) for its consideration and approval.

**C. In the 2003-2004 CEQA Litigation Proceedings, Judge Dzintra Janavs Determined that Santa Clarita Must Prepare a Full EIR Before Re-initiating Any Efforts to Control the Las Lomas Project Area.**

Throughout the ensuing CEQA litigation, Las Lomas argued to the Superior Court that Santa Clarita’s abbreviated ND took a prohibited “piecemeal” approach toward the Las Lomas Project. Rather than looking at “the whole of the action” and preparing an EIR “at the earliest stage,” as CEQA requires, Santa Clarita was seeking to “chop[] a large project into many little ones – each with a minimal potential impact on the environment” in order to avoid full environmental review through an EIR. (See Exhibit H – excerpts from Las Lomas’ Opening Brief, citing, *inter alia*, *Bozung v. Ventura County LAFCo* (1975) 13 Cal.3d 263 and *Rural Landowners Ass’n v. Lodi City Council* (1983) 143 Cal.App.3d 1013.) As Las Lomas argued, Santa Clarita could not “de-link” its proposed discretionary approvals seeking Santa Clarita’s jurisdiction and control over the subject parcel from the Las Lomas Project itself, because that development project is reasonably foreseeable, irrespective of which jurisdiction ultimately gains control over the Project area. (See *id.* at pp. 14 to 21.) (Las Lomas hereby incorporates by

Santa Clarita City Council

May 8, 2005

Page 4

reference the entire administrative record and court file from the 2003-2004 CEQA litigation proceedings.)

Superior Court Judge Dzintra Janavs agreed entirely with these CEQA arguments put forward by Las Lomas. The Court's April 13, 2004 Statement of Decision ruled that the administrative record contained "substantial evidence to support a fair argument that [Santa Clarita's] actions may have significant environmental impacts." As Judge Janavs noted, Santa Clarita had explicitly conceded that "any development in the Las Lomas Project area will have a significant environmental impact," and Santa Clarita's comments on Los Angeles' NOP had enumerated an extensive list of potential environmental impacts. Further, future development of the site by Las Lomas was, in fact, "reasonably foreseeable" no matter which jurisdiction ultimately gained control over the subject parcel. (See Exhibit I – the Superior Court's April 13, 2004 Statement of Decision, at p. 3.)

As noted above, Judge Janavs therefore mandated Santa Clarita to set aside its February 2003 discretionary approvals relating to obtaining control over the unincorporated area that included the Las Lomas Project site, and ordered Santa Clarita to prepare a full EIR "in any subsequent processing" of those discretionary approvals. (See Exhibit J – Final Judgment and Writ of Mandate.)

**D. In 2002-2005, Los Angeles Undertook Processing of its Area-wide Sphere of Influence Application.**

Meanwhile, in November 2002, Los Angeles began processing an area-wide Sphere of Influence Application that proposed to encompass the remaining unincorporated areas within the San Fernando Valley within Los Angeles' sphere of influence. (See Exhibit K – November 14, 2000 Los Angeles City Council motion.) As eventually released to the public, this Los Angeles Sphere of Influence Application encompassed fully 19,242 acres, or slightly more than 30 square miles. According to Los Angeles, this proposed sphere of influence would generally "follow the natural ridgeline of the San Gabriel and Santa Susana Mountains, so that the Los Angeles River watershed generally would be placed into Los Angeles' sphere of influence." (See Exhibit L – April 6, 2005 Staff Report and ND, at p. 2.)

With respect to the Las Lomas Project parcel, neither the Los Angeles staff report nor Los Angeles' ND for its Sphere of Influence Application explains the reasons for where the line is drawn. It appears from the map attached to the Los Angeles' ND, that, where the line crosses



Santa Clarita City Council

May 8, 2005

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the Las Lomas parcel, it approximates in some ways the ridgeline, although that is not clear. (See *id.* at p. 10.)<sup>1</sup>

Notably, a December 15, 2004 front-page news article in the *Daily News* reported that certain Santa Clarita and Los Angeles officials had held a series of behind-closed-doors meetings and “quietly cut a deal” that would split the Las Lomas Project parcel between the two cities. According to the *Daily News* article, the new sphere of influence line would be drawn between the two cities so that Los Angeles would obtain approximately 25 percent of the land and Santa Clarita would obtain approximately 75 percent of the land. The article further described how the proposed sphere of influence boundaries would intentionally block Las Lomas’ development as proposed by Las Lomas’ 2002 entitlements request, which is still being processed by Los Angeles. (See Exhibit M – December 15, 2005 *Daily News* article.)

Las Lomas believes that Los Angeles’ ND for its proposed Sphere of Influence Application is legally deficient, at least as it relates to the Las Lomas Project parcel. Either all of the Las Lomas parcel should be placed into Los Angeles’ proposed sphere of influence, so that Las Lomas can continue efficiently planning out its project infrastructure requirements and mitigation measures, or none of the Las Lomas parcel should be included in Los Angeles’ proposed sphere. This way, any decision on the location of the sphere of influence boundaries as they overlay the Las Lomas Project parcel would be made in connection with, and in consideration of, Los Angeles’ other actions on the pending Las Lomas Project entitlements requests. These important decisions about the future jurisdictional control over, and development of, the Las Lomas Project area should be made only *after* all appropriate, relevant environmental data has been gathered and full CEQA analysis has been completed with respect to the subject parcel, and they should not be prematurely made at this point in time based solely on a “back-room deal.”

**E. Santa Clarita Has Now Begun Processing Its Own Las Lomas Project Parcel-Specific Sphere of Influence Application.**

Rather than joining Las Lomas in critiquing the inadequate environmental data and analysis upon which Los Angeles now proposes to extend its sphere of influence northward within the Las Lomas Project parcel, Santa Clarita also now proposes to extend its own sphere of

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<sup>1</sup> Although the Los Angeles staff report prepared in connection with its pending Spheres of Influence Amendment Application specifically identifies the Las Lomas Project area, it does not provide any textual or other analysis of the potential environmental impacts that may result from drawing the sphere of influence plan boundaries across the middle of the subject parcel.

influence southward within the Las Lomas Project parcel. According to Santa Clarita's recently released April 8, 2005 ND, Santa Clarita is now processing a 595-acre parcel-specific Sphere of Influence Application that would essentially complete the other side of the *Daily News*-reported "back-room deal." Notably, the area in question is the same area where Santa Clarita had previously sought to extend its sphere of influence, annex and pre-zone, based on a mere ND (i.e., the February 2003 ND invalidated by Judge Janavs), instead of a full EIR. Yet Santa Clarita's current ND does not even mention the Superior Court's order commanding it to prepare a full EIR, as required by CEQA. Nor does Santa Clarita attempt to develop a new approach or a new rationale for its proposed sphere of influence action based on a mere ND. The reader of the ND perceives an unfortunate sense of *déjà vu*, encountering the same rejected rationale that the proposed sphere of influence plan amendment action initiating Santa Clarita's jurisdictional control over the subject area "is not related to any proposed development on the site." The current Santa Clarita ND again advises that it does not need to consider or evaluate "the impacts of speculative development projects that may be proposed on the project site through municipalities having no jurisdiction over the site." Santa Clarita's ND simply resurrects the same previously invalidated "party line": no "reasonably foreseeable impacts" will supposedly ensue from its discretionary approval, and the proposed sphere of influence boundary change "cannot and will not" have any foreseeable new environmental impacts. (See Exhibit N – Santa Clarita's April 8, 2005 ND, at pp. 8, 9, 10, 26, 27, 28, 29, 30, 32, 33, 35, 36, 37.)

**I. As with the Previously Invalidated Discretionary Approvals Proposing to Initiate Santa Clarita's Jurisdictional Authority over the Las Lomas Project Area, Santa Clarita's Recently Proposed Sphere of Influence Amendment Is Subject to CEQA, and, Because Its Approval Will Involve Important Planning Issues and May Have Significant Environmental Impacts, a Full EIR Must Be Prepared.**

Under the Cortese-Knox-Hertzberg Local Reorganization Act of 2000 (the "Act"), LAFCo decisions approving proposed sphere of influence plans for particular areas continue to have profound influence on the way the affected areas are likely to develop. Under section 56076 of the Act, a sphere of influence plan constitutes the LAFCo's "plan for the *probable physical boundaries and service area* of a local agency." Importantly, section 56375.5 requires that every LAFCo decision relating to changes of organization, including proposed annexations by cities, "shall be consistent with the spheres of influence" of the pertinent local agencies.

In determining the appropriate sphere of influence plan for a given area, the LAFCo must follow policies that are designed to "promote the logical and orderly development within the sphere." (Section 56425(a).) When an area is proposed to be placed within a city's sphere of influence, the affected city and county representatives must meet to reach agreement on how, prior to actual annexation by the city, the county will make its future land use decisions (e.g.,

zoning and other development standards) in that portion of the unincorporated area in a manner that "reflects the concerns of the affected city" and that "promotes logical and orderly development within the sphere." (Section 56425(b).) Once that agreement is approved by the LAFCo, the city and county must adopt it, and, thereafter, "any development approved by the county within the sphere shall be consistent with" the agreement. (Section 56425(c).) If no such agreement is reached, the LAFCo must implement its own planning policies regarding the sphere. (Section 56425(d).)

Recognizing the key importance of the sphere of influence plan, the Act dictates that, before the LAFCo approves or amends any such plan, the LAFCo must make specific factual determinations regarding the following:

- (1) The *present and planned land uses* in the area, including agricultural and open-space lands.
- (2) The *present and probable need for public facilities and services* in the area.
- (3) The *present capacity of public facilities and adequacy of public services* that the agency provides or is authorized to provide.
- (4) To the extent they are relevant, *the existence of any social or economic communities of interest* in the area.

(Section 56425(e).)

Furthermore, when the LAFCo initially prepares, and then later updates, its sphere of influence plan for an area, it must conduct a "service review of the municipal services" being provided within the county, particularly within the affected area, with respect to the following:

- (1) Infrastructure needs and deficiencies.
- (2) Growth and population projections for the affected area.
- (3) Financing constraints and opportunities.
- (4) Cost avoidance opportunities.
- (5) Opportunities for rate restructuring.
- (6) Opportunities for shared facilities.

- (7) Government structure options.
- (8) Evaluation of management efficiencies.
- (9) Local accountability and governance.

(Section 56430(a).) This service review must be completed before the LAFCo acts upon a city's sphere of influence amendment application. (Section 56430(c).)

Because these sphere of influence amendment issues have important environmental and planning implications, the Act expressly provides that, whenever a city requests that the pertinent sphere of influence plan be amended, *the LAFCo cannot consider the request without "first complying with [CEQA]."* (Section 56428(b).)

In *City of Livermore v. LAFCo of Alameda County* (1986) 184 Cal.App.3d 531, the Court of Appeal required that a full EIR be prepared in connection with a sphere of influence proceeding and explained the importance of CEQA compliance in connection with LAFCo sphere of influence decisions. In that case, a LAFCo's sphere of influence guidelines had provided generally that existing and future urban development belongs in cities, making it difficult for special districts to extend their service areas to proposed urban development in the unincorporated areas. A private developer proposed an urban development project, "Las Positas," in the unincorporated area near Livermore's boundaries. As here, Livermore sought to extend its sphere of influence boundaries into the proposed Las Positas development area, but the LAFCo rejected its application. The LAFCo then modified the former sphere of influence guidelines by deleting the former urbanization-in-cities policy, thereby facilitating future development of Las Positas within the unincorporated area.

The Court ruled that a full EIR was required before the LAFCo could properly take these sphere of influence plan actions. The Court explained:

*The sphere of influence guidelines influence LAFCo decisions about development plans and future growth of cities and service areas. The guidelines play a part in determining whether growth will occur in unincorporated areas and whether agricultural land will be preserved or developed. They may change the focus of urban development by promoting county plans over city plans. These potential effects will certainly impact the environment. It is true that the precise effects are difficult to assess at this stage, but it is because impact is so easily foreseen that the revisions just be considered a project under CEQA.*

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As to the argument that the revisions are not a tangible physical activity, CEQA and its guidelines focus on the ultimate impact of a project, not on whether the project is tangible or intangible. The CEQA [guidelines] already include actions that are not physical activities.... Just as the amendment of a general plan will influence the future growth and development of cities, so too will the sphere of influence guideline revision have such an effect.... The "act or decision" we review here is not the decision that the project may or may not have a significant environmental impact, but the decision that it can or cannot be fairly argued that the project may have a significant environmental impact....

In *Muzzy Ranch Co. v. Solano County Airport Land Use Commission* (2005) 125 Cal.App.4th 810, 826-830, the Court of Appeal recently reiterated that CEQA requires EIRs be prepared early in the decision-making process – in that case, at the point in time when an airport land use plan was adopted by an Airport Land Use Commission ("ALUC"). There, the ALUC had adopted its plan that would preclude jurisdictions surrounding an airport from approving residential development in a large area that would potentially be exposed to high noise levels from aircraft using the airport. In ruling that the ALUC's decision was subject to CEQA, the appellate court explained that the approved plan had the potential to displace housing development outside the affected area, a potential that was not so "speculative or remote" that it could not be considered a "reasonably foreseeable" consequence of the ALUC's new plan. The ALUC's plan was "a necessary step in the chain of events" that "set in motion a process and can be expected to carry some authority." The Court found the *Livermore* decision about sphere of influence plans to be directly on point, because the sphere of influence guidelines "play a part in determining" where growth will occur, even though the precise effects might be difficult to assess. The critical factor must be to preclude a "piecemeal environmental review" by which initial decisions about an overall project are approved early without adequate environmental review.

Precisely these important CEQA considerations led Judge Janavs to rule in the earlier Superior Court proceedings regarding the Las Lomas Project area that Santa Clarita must prepare a full EIR before it can undertake further discretionary actions to obtain jurisdiction and control over the subject area. These rulings, of course, are *res judicata* as to the Las Lomas Project area and Santa Clarita's actions, because Santa Clarita did not appeal the Superior Court's final judgment.

**II. Without Adequate Evaluation Under CEQA of How the Sphere of Influence Boundaries Would Impact the Environment Generally and the Las Lomas Project In Particular, Santa Clarita's Proposed Sphere of Influence Plan Amendment Is Premature, and Will Greatly Prejudice Las Lomas.**

Since 2002, Las Lomas has been cooperating with Los Angeles to prepare a draft EIR in support of the required discretionary actions by Los Angeles and the LAFCo to bring about the Las Lomas Project. Las Lomas has expended fully \$ \*\*\* million in fees to the environmental consultants who are assisting in preparing the draft EIR, and has paid \$ \*\*\* in processing fees directly to Los Angeles. Today, Las Lomas still fully intends to develop the Las Lomas Project or whatever lesser development entitlements may finally be granted to it by whichever governmental authority is ultimately awarded long-term jurisdiction and control over the Las Lomas Project area.

As the Cortese-Knox-Hertzberg Local Reorganization Act's provisions relating to sphere of influence amendments dictate and as Judge Janavs has commanded, Santa Clarita must comply with CEQA and prepare a full EIR before it considers where the sphere of influence boundary should be drawn over the Las Lomas Project area. This full EIR should gather all relevant data and information, and should evaluate the ways that the government control over the Las Lomas Project area, including where the sphere of influence boundary lines are proposed to be drawn, may influence the nature and intensity of development, as well as the ability of the developer and the governing city to deliver urban services and to formulate and implement mitigation measures in connection with that development.

More study is needed on a host of environmental issues, but, presently, Santa Clarita's ND provides essentially no information and analysis relating to these matters. A few examples suffice.

- Like Los Angeles', Santa Clarita's ND and accompanying staff report focus almost exclusively on stating a few obvious platitudes about the watershed implications of drawing the sphere of influence plan boundary at the ridgeline across the Las Lomas Project parcel and else where.
- Watershed should be a factor in drawing a sphere of influence boundary line, but it is certainly not the only factor. Traffic and other important environmental issues must also be considered. Absent comprehensive traffic mitigation measures, the traffic that the Las Lomas project will generate on the 70 to 75 percent of the land that is north of the watershed line will overwhelmingly flow south into the City of Los Angeles. Los Angeles Department of

Transportation representatives have informed Las Lomas representatives that the great majority of the traffic expected to be generated by Las Lomas will be southbound, requiring extensive mitigation within the Los Angeles. Certainly, Los Angeles will have the greater impacts from any unmitigated traffic generated by the Las Lomas project, and Los Angeles should have direct authority and control over the boundaries of the Las Lomas Project area, so that it can more directly monitor and implement traffic mitigation measures that will address project-related traffic.

- The proposed Las Lomas elementary school and one of the two proposed high school academies are on the north side of the watershed line, while the other proposed high school academy is on the south side of the watershed line. Dividing these schools by a sphere of influence line would lessen the school district's ability to coherently plan for facilities, construction and operations.
- The proposed Las Lomas industrial center and hotel are to be located in the northern portion of the project area. If Santa Clarita obtains jurisdiction and control over that area and pursues its long-standing plans to approve only ultra-low density single family residential land uses, the thousands of jobs and millions of dollars in taxes annually that would be generated by these important project components would be lost.
- LAFCo as well as both Santa Clarita and Los Angeles have long-standing traditions of respecting landowner requests not to be split into multiple jurisdictions. The landowners of the Las Lomas Project area unanimously desire annexation to Los Angeles, and not to Santa Clarita, either in whole or in part.
- Several existing and proposed major public infrastructure systems presently straddle the watershed line, including: the existing MTA commuter line tunnel and the proposed MTA station; the existing high pressure gas lines; the existing California aqueduct; the existing Sunshine Canyon landfill; the proposed wildlife corridors that Las Lomas is presently designing with the assistance of the Santa Monica Mountains Conservancy; the existing high tension power lines and the proposed realignment; the existing and proposed internal access roads; the proposed freeway improvements providing access both to the proposed park and ride multi-modal transit station and to the project site; the existing and proposed hiking and equestrian trails meander across the watershed line several times.

- In part for these reasons, existing jurisdictional boundaries in the vicinity do not follow the exact watershed line, but rather weave around these major systems and features, generally avoiding dividing any single land ownership into multiple jurisdictions.

In summary, in formulating a sphere of influence boundary, the watershed line is but one among numerous significant considerations: wildlife issues, regional infrastructure issues, demographic issues, economic development issues, ownership patterns that do not mirror the natural features, and fiscal issues, just to name a few. The purpose of a sphere of influence plan is to integrate environmental and planning information on all such major issues, before making the decision on how these governmental jurisdictions and service areas should be shaped.

For reasons that appear to be explained by the desire to implement the reported "back-room deal," Santa Clarita now proposes to amend its sphere of influence to obtain 70 to 75 percent of the Las Lomas Project area within its boundary, leaving the remainder to Los Angeles. Whether the figure is 100 percent or something less, however, Santa Clarita is still proposing to act prematurely, once again before the necessary EIR data gathering and analysis are completed. This is directly contrary to Judge Janavs' order that Santa Clarita can proceed with discretionary approvals to initiate and implement its control over the Las Lomas Project parcel only after Santa Clarita has first completed a full EIR.

## **CONCLUSION**

Santa Clarita cannot act on the currently proposed Sphere of Influence Amendment Application without first preparing a full EIR. Any attempt to proceed without an EIR will be directly flying in the face of Judge Janavs' April 13, 2004 mandate.

Very truly yours,

Carlyle W. Hall, Jr.

Enclosures



PLEASE SCHEDULE FOR COUNCIL ON FRIDAY, MAY 6, 2005

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**BLURB**

05-0671  
CDs 2,3,7  
& 12

NEGATIVE DECLARATION, COMMUNICATION FROM THE PLANNING DEPARTMENT AND RESOLUTION relative to amending the boundaries of the sphere of for the City of Los Angeles influence for the City of Los Angeles and approving the application to the Local Agency Formation Commission of the County of Los Angeles to amend the sphere of influence pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

(Planning and Land Use Management Committee Report to be submitted in Council. If public hearing is not held in Committee, an opportunity for public comments will be provided.)

(For copies of the reports for this matter, please contact the Legislative Assistant for the Planning and Land Use Management Committee at 213-978-1068)

Fiscal Impact Statement: None submitted by the Planning Department. Neither the City Administrative Officer nor the Chief Legislative Analyst has completed a financial analysis of this report.

#050671blb

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**DATE:** April 6, 2005

**TO:** Honorable Ed Reyes  
Planning and Land Use Management Committee  
Los Angeles City Council

**FROM:** Con Howe   
Director of Planning  
Los Angeles Department of City Planning

**SUBJECT:** Amendment to the Boundaries of the Sphere of Influence  
CF-00-2206

*CDS  
2,3,5,6,7,  
#4/2  
per Dave  
Hester*

## BACKGROUND

On November 14, 2000, the City Council adopted a Motion (Bernson-Galanter, CF 00-2206) instructing the City Planning Department, with assistance from the Chief Legislative Analyst, to prepare an application to the Local Agency Formation Commission of the County of Los Angeles to amend the boundaries of the sphere of influence for the City of Los Angeles pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. The sphere of influence is the geographic area in Los Angeles County that is determined to be the probable, ultimate physical boundaries and service area for the City of Los Angeles. The current boundary of the sphere for the City of Los Angeles is coterminous with the incorporation limits, as shown on Exhibit A.

## BOUNDARY RECOMMENDATION

The requested northern boundary of the proposed sphere of influence amendment follows the natural ridgeline of the San Gabriel and Santa Susana Mountains. Staff recommends that the boundary of the sphere be expanded to include the areas near Dayton Canyon between the Ventura County Line and the City of Los Angeles on the west, north along the Ventura County line to the ridgeline of the Santa Susanna



Mountains, turning east following the ridgeline of the Santa Susana Mountains (west of the 405 Freeway) to the limits of the City of Santa Clarita at the Sierra Highway. The boundary then follows the limits to the south and then east, and continues to follow the ridge line eastward to the boundary of the Angeles National Forest before turning southward following the boundary of the National Forest and the unincorporated areas to a terminus south of Little Tujunga Road. In some areas, these proposed boundaries follow the current boundary with deviations to include unincorporated areas between the City of Los Angeles and Ventura County and between the City of Los Angeles and the Angeles National Forest. Along the northern segment, the border was chosen to include unincorporated areas in the San Fernando Valley that are south of the natural ridgeline of the Santa Susana Mountains as shown on Exhibit B. Slight modifications were made to account for ownership of parcels. The ridgeline separates the San Fernando valley from the Santa Clarita Valley and defines the northern edge of the drainage basin for the San Fernando Valley. Water flowing from the southern face of the ridge feeds the Los Angeles River and the valley aquifer. Municipal services that are gravity driven such as sewer service can be provided more efficiently by the local agency located downward from the ridge.

Portions of the Los Angeles River watershed that are in the proposed sphere of influence help mitigate flooding, maintain water quality and quantity, recycle nutrients, and provide an important habitat for plants and animals. The City Council established the Los Angeles Ad Hoc River Committee in June 2002 to focus on major revitalization efforts for the Los Angeles River including opportunities for parks, trails, recreation, nature, neighborhood identity, jobs, community development, tourism, and civic pride. One of the guiding principles for the Los Angeles River is viewing the river as an important natural resource with emphasis on the ecology of the river, flood management, and sustainability. Encompassing the watershed for the Los Angeles River in the sphere of influence for the City of Los Angeles is both logical and paramount to the continued success of revitalization efforts.

The Los Angeles River watershed is an important boundary on which to base the Sphere of Influence as it directly impacts the delivery of a wide range of services related to stormwater and water quality. Rain that falls within the unincorporated portions of the Los Angeles River watershed eventually passes through the City of Los Angeles. Any activities that generate water-borne pollutants regulated by the State will affect the City. The City of Los Angeles settled two lawsuits, in 2002 and 2003, related to State requirements concerning TMDL requirements in stormwater flows. Voters in 2004 passed a \$500 million bond to address stormwater needs and general environmental enhancements. Providing the City a Sphere of Influence over this area improves the City's ability to provide stormwater management services to the area and ensures more efficient, direct management responsibility for any pollutants that occur throughout the Los Angeles River watershed because there would be fewer governmental agencies with responsibility for that area.

## **DESCRIPTION OF PROPOSED AMENDMENT AREA**

The proposed amendment area for the City's sphere of influence covers 19,242 acres, or slightly more than 30 square miles. Major ridgelines of the transverse Santa Susana Mountain Range are to the north and west, and metropolitan communities of the

Los Angeles Basin are to the south. Portions of Ventura County adjacent to the amendment area contain parklands, agricultural land uses and scattered single-family residences. Sunshine Canyon Landfill is adjacent to the area on the north. The project area is contiguous to portions of Council Districts 3, 12, 7 and 2 and community plan areas of Canoga Park – Winnetka - Woodland Hills - West Hills, Chatsworth - Porter Ranch, Granada Hills – Knollwood, Northridge, Sylmar, and Sunland - Tujunga - Shadow Hills - Lakeview Terrace - East La Tuna Canyon.

The land uses in the northern San Fernando Valley within the City of Los Angeles are classified mainly as Open Space or Minimum Residential with some Very Low and Low density Residential in the Porter Ranch area, as shown on Exhibit C. The land in the proposed amended area is designated by the County General Plan primarily as Non-Urban and Open Space. There are rural communities near Little Tujunga Road, and north of the 118 near the current western city border. Deerlake development has been approved north of the rural community of Twin Lakes. A small acreage of commercial and industrial developments exist at intersection of Interstate 210 and State Highway 118. Major arterial roads in the proposed amendment area include Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road. Metrolink runs through the proposed area between Interstate 5 and State Highway 14.

Mountain ridges of varying heights, canyons, and flat land define the topography of the proposed amendment area. It is largely undeveloped land and is within the Santa Monica Mountains Conservancy Zone—Rim of the Valley Trail Corridor, a system of natural lands that shelters wildlife and extends recreational opportunities in the San Fernando and San Gabriel Valley areas, as shown on Exhibit D. The northwestern portion of the proposed sphere of influence contains a Significant Ecological Area (SEA) as defined and delineated in conjunction with the Land Use and Open Space Elements of the County General Plan.

Major tributaries for the Los Angeles River originate on the southern slopes of the Santa Susana Mountains within the proposed sphere of influence for the City of Los Angeles. These include the Santa Susana Wash, Browns Canyon Wash, Limekiln Canyon Wash, Wilbur Creek, Aliso Canyon Wash, and Bull Creek. The headwaters of the Los Angeles River are in the Simi Hills, formed by Chatsworth Creek, Dayton Canyon Wash, Bell Creek and Calabasas. These tributaries provide an important habitat for plants and animals.

Recreation areas containing hiking, biking and equestrian trails are adjacent to and within the proposed amendment area. Parks include: Bell Canyon Park, Knapp Park, Roscoe-Valley Circle Park, Chatsworth Nature Preserve/Reservoir, Chatsworth Oaks Park, Rocky Peak Park, Michael D. Antonovich Regional Park at Joughin Ranch, Brown's Canyon Park, Moonshine Canyon Park, Limekiln Canyon Park, Porter Ridge Park, O'Melveny Park, Santa Clarita Woodlands Park, Stetson and Wilson Canyon debris basins, Wilson Canyon Park, and Veterans Memorial County Park. The Angeles National Forest is north of the proposed sphere east of the 405 freeway.

## **PURPOSE OF THE SPHERE OF INFLUENCE**

A sphere of influence is a planning tool or guide for the probable, ultimate physical boundary and municipal service area of a local governmental agency. In general, the purpose of a sphere of influence is to:

1. Facilitate orderly growth in the unincorporated areas adjacent to a city;
2. Coordinate property development standards, and encourage timely provision of adequate and essential services, such as parks, recreation, and flood control and, if urbanization of unincorporated areas occurs, streets, sewer, water, solid waste disposal, and police and fire protection;
3. Promote cooperative planning between the city and county, various public/private service entities, major landowners, and facilitate proper implementation of their respective general or master plans;
4. Assist all government agencies and private entities in any planning and scheduling for extension of their facilities and services to assure it will be done in a logical, orderly, and economical manner, thus avoiding expensive and unnecessary duplication of effort; and
5. Promote, assist, and enhance property owners' ability to plan comprehensively, and with reasonable assurance for the ultimate use and development of their lands.

## **IMPACT OF THE SPHERE AMENDMENT**

Historically, the City of Los Angeles has provided services to the proposed amendment area. The ridgeline of the Santa Susana Mountains and the Angeles National Forest provide natural dividing lines between Los Angeles and the jurisdictions to the north. The City has an extensive network of police, fire, sanitation, and other services in operation adjacent to this areas and logically would provide the most effective service to these areas. The Los Angeles Police Department provides police service, and the Los Angeles City Fire Department provides fire and paramedic service within the municipal boundaries and also serve the surrounding unincorporated area of Los Angeles.

An expansion of the City's sphere of influence would formalize a procedure for the County to refer proposed actions and proposals for unincorporated areas to the City for review and comment. It is imperative that the City have a role in any proposals for development of upstream areas since increased urbanization would tax the carrying capacity of the Los Angeles River by decreasing permeable area, resulting in a rise in inflow peaks and volumes into the river. Several of the tributaries that are in the sphere amendment area are currently classified in the 500 year flood plain. The City has a need to assure adequate flood protection, reduce the velocity of storm water and runoff, and keep stormwater pollution levels below the total maximum daily loads.

An amended sphere of influence would allow the City of Los Angeles review authority for projects located inside Los Angeles County, outside of the City Limits, but within the

sphere area. Even though procedures for interagency referrals would change, the existing jurisdictional authority for projects within the unincorporated area would remain with the County of Los Angeles. No environmental plans or policies will be altered due to modifications of the City's sphere of influence boundary, nor will changes occur to jurisdictional authorities. An Initial Study was prepared and it was determined that amending the sphere of influence would have no environmental impacts. A Negative Declaration was published for the amendment to the sphere of influence and is included as Exhibit E.

Amending the boundary for the sphere of influence will have no effect on development—it will be neither easier nor harder. The primary effect of the boundary change will be to establish which government entity is the logical service provider. Becoming part of the sphere of influence does not change any processes or procedures. Any impact would come if an area is annexed, which can be requested without the amended sphere. Currently, unincorporated areas are governed by Los Angeles County; if annexed to the City of Los Angeles, they would be governed by the regulations and processes of the City. Any territories to be annexed would be pre-zoned. In the pre-zoning process, the City is required to comply with the California Environmental Quality Act and follow the same procedures and allow the same public comment as for a change in zone.

Although an expanded sphere of influence would facilitate processing requests for annexation from property owners and residents of inhabited areas, modification to a sphere of influence is not an annexation, nor does modification to an adopted sphere initiate annexation proceedings. No changes to jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use would ensue as a result of adopting a sphere of influence. The proposed area to be included in the amended sphere of influence of the City of Los Angeles will remain as part of the unincorporated portion of the County of Los Angeles. Future uses must be consistent with the General Plan and Zoning of Los Angeles County. A requirement of Government code Section 56425 is that any land included within the sphere of influence of the City of Los Angeles must be consistent with all parts of the General Plan for Los Angeles. No one part takes precedence. Land Use designations and zoning for the City of Los Angeles are assigned if and when the land in the sphere is annexed.

Because no development is being proposed as part of this project, the modifications to the City of Los Angeles's existing sphere of influence boundary will not result in a direct impact upon open space. Parks and recreation services provided within the amended sphere area would remain under the direct influence of the County of Los Angeles. The proposal will therefore not result in an impact to the quantity of existing recreation opportunities currently provided throughout the San Fernando Valley. Decisions on development or providing open space will depend on ownership of the land and the desires of the owner within established regulatory requirements.

## **ROLE OF LAFCOs**

LAFCOs exercise both regulatory and planning functions. They are responsible for annexations and detachments of territory to and/or from cities and special districts, incorporations of new cities, formations of new special districts, and consolidations, mergers, and dissolutions of existing districts. In addition, LAFCOs must review and approve contractual service agreements, determine spheres of influence for each city and district, and may initiate proposals involving district consolidation, dissolution, establishment of subsidiary districts, mergers, and reorganizations (combinations of these jurisdictional changes).

The major planning task of LAFCOs is the establishment of a sphere of influence for each local agency in its jurisdiction. Prior to 2000, the State of California approved the formation of many new local government agencies, often with little forethought as to the ultimate governance structures in a given region. Lack of coordination and adequate planning led to a multitude of overlapping, inefficient jurisdictional and service boundaries, and to the premature conversion/loss of California's agricultural and open-space lands. The Cortese-Knox-Hertzberg Act established Local Agency Formation Commissions as the regulatory agencies with countywide jurisdiction. Their purpose was to discourage urban sprawl, while encouraging orderly and efficient provision of services such as water, sewer and fire protection.

In considering an application to amend a local agency Sphere of Influence, LAFCOs must consider and make written determinations with regard to the following factors:

1. The present and planned land uses in the area, including agricultural and open space lands;
2. The present and probable need for public facilities and adequacy of public facilities and services in the area;
3. The present capacity of public facilities and adequacy of services that the agency provides or is authorized to provide; and
4. The existence of any social or economic communities of interest in the area, if the commission determines that they are relevant to the agency.

Upon adoption, LAFCOs use a sphere of influence as a factor in making determinations and decisions for proposals concerning cities or special districts and adjacent territories over which LAFCO has authority and jurisdiction. LAFCOs coordinate the orderly development of a community by reconciling the differences between city and county plans so that the most efficient urban service arrangements are created for the benefit of area residents and property owners.

LAFCO requires consistency with city general plans in adopting or amending a sphere of influence. The Commission, when establishing spheres of influence, considers joint City/County Specific Plans and factors such as density policies, development standards, geology, and future use. LAFCO also considers fiscal impacts of proposed sphere amendments. LAFCO has sole responsibility for establishing a city's sphere of influence. Further, LAFCO is not required to establish a sphere that is greater than the

Amendment to the SOI

city's existing boundaries. Spheres of influence for cities and special districts may overlap when both agencies expect to provide service to the area.

## **RECOMMENDATIONS**

The Los Angeles Department of City Planning recommends that the City request an amendment to the boundaries of the sphere of influence for the City of Los Angeles as shown on Exhibit A attached hereto. Accordingly, it recommends that the City Council approve the application to the Local Agency Formation Commission of the County of Los Angeles to amend the sphere of influence pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, included as Exhibit F and adopt the Resolution included as Exhibit G.

cc: Honorable Wendy Gruel, District 2  
Honorable Denis Zine, District 3  
Honorable Jack Weiss, District 5  
Honorable Tony Cardenas, District 6  
Honorable Alex Padilla, District 7  
Honorable Cindy Miscikowski, District 11  
Honorable Greig Smith, District 12  
Mr. John Wickham, Office of the Chief Legislative Analyst



**Exhibit A: Map of Current and Proposed Sphere of Influence**



## **Exhibit B: Map of LA River and Major Tributaries**

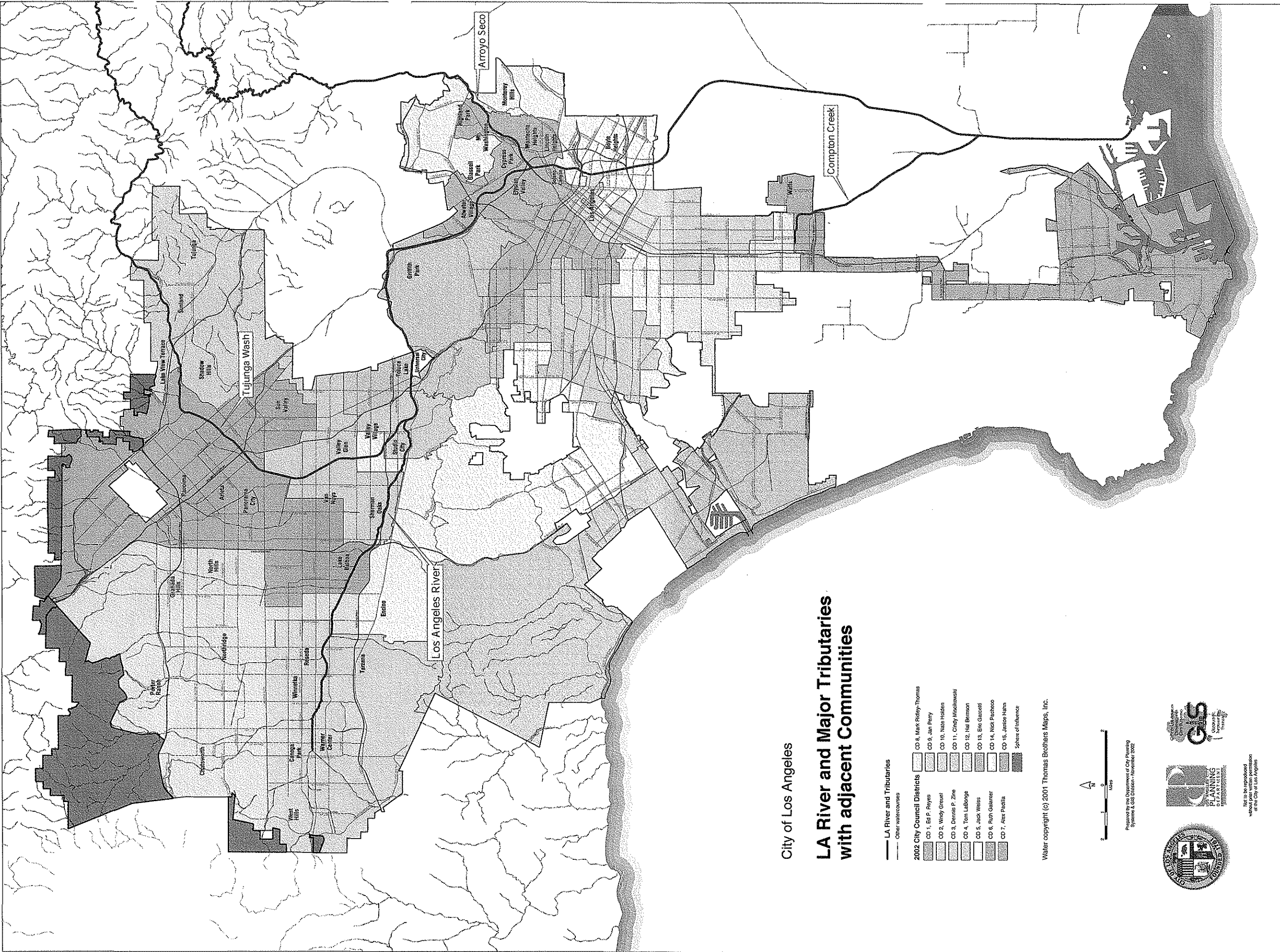
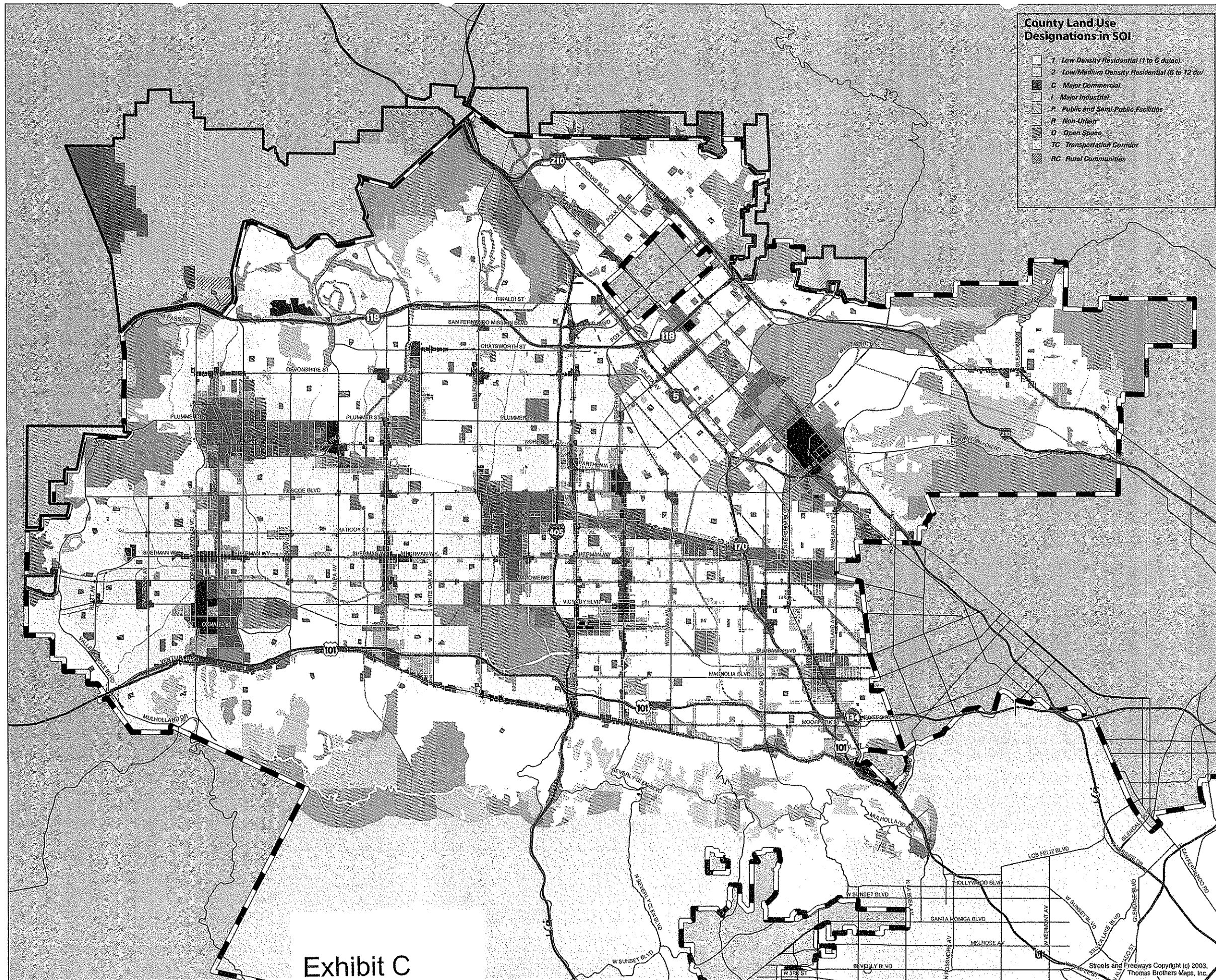


Exhibit B

**Exhibit C: Map of San Fernando Valley General Land Use  
and  
County Land Use**





**County Land Use Designations in SOI**

- 1 Low Density Residential (1 to 6 du/ac)
- 2 Low/Medium Density Residential (6 to 12 du/ac)
- C Major Commercial
- I Major Industrial
- P Public and Semi-Public Facilities
- R Non-Urban
- O Open Space
- TC Transportation Corridor
- RC Rural Communities

**City of Los Angeles**  
**San Fernando Valley**  
**General Plan Land Use**

**Residential**

- Minimum
- Very Low Density
- Very Low I
- Very Low II
- Low Density
- Low I
- Low II
- Low Medium Density
- Low Medium I
- Low medium II
- Medium Density
- High Medium Density
- High Density
- Very High Density

**Commercial**

- Neighborhood Commercial
- Limited Commercial
- General Commercial
- Community Commercial
- Regional Commercial

**Industrial**

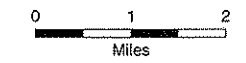
- Commercial Manufacturing
- Limited Manufacturing
- Light Manufacturing
- Heavy Manufacturing
- Parking

**Open Space, Public Facilities**

- Open Space
- Public Facilities

City Boundary (PLN)

Proposed Addition to Sphere of Influence



Prepared by the Department of City Planning  
 Systems & GIS Division - September 2004

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 of the City of Los Angeles

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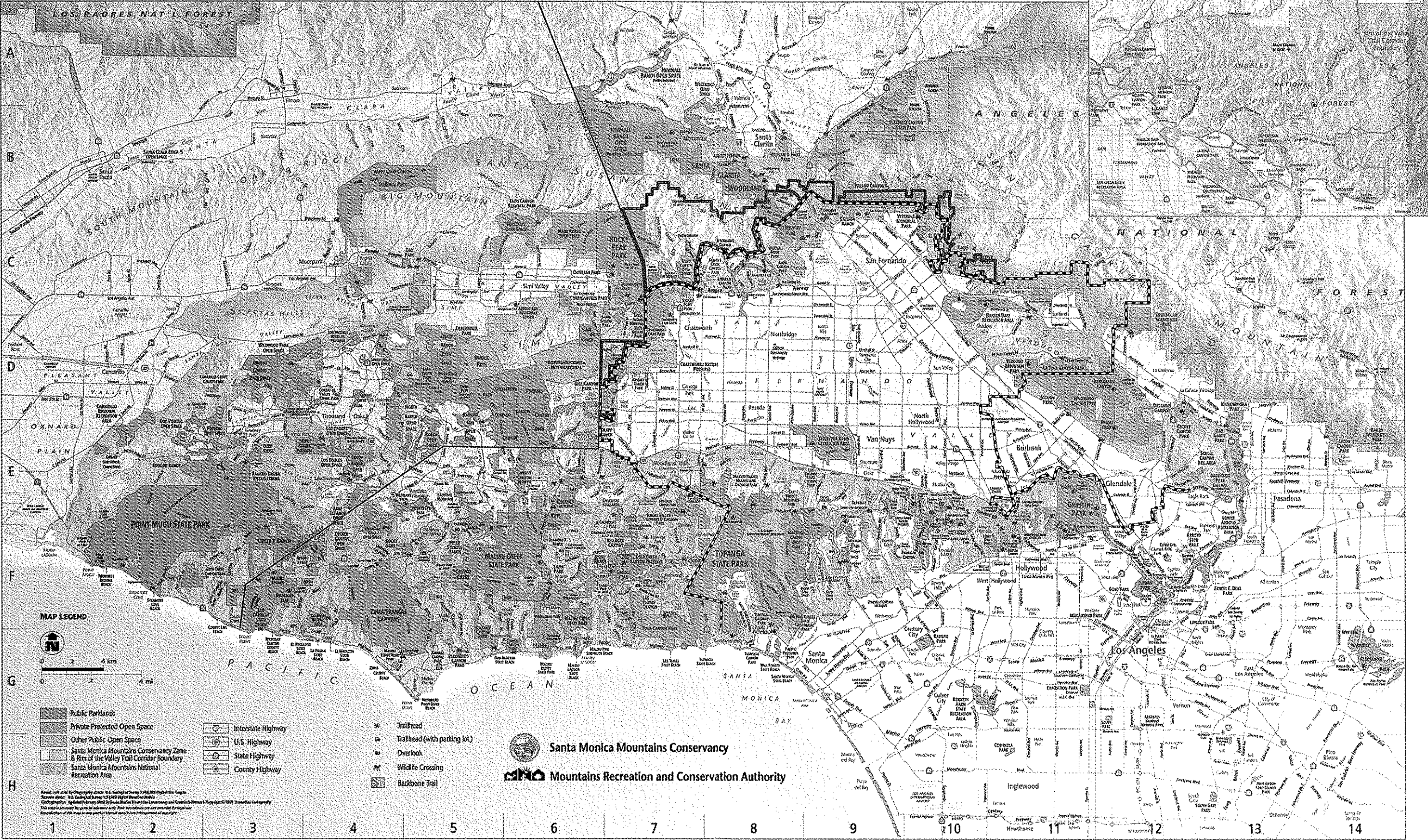
**Exhibit C**

Streets and Freeways Copyright (c) 2003,  
 Thomas Brothers Maps, Inc.

**Exhibit D: Map of the Rim of the Valley Corridor**



# Parklands and Open Space



**SANTA MONICA MOUNTAINS CONSERVANCY ZONE - RIM OF THE VALLEY CORRIDOR**



## **Exhibit E: Negative Declaration and Initial Study**

CITY OF LOS ANGELES  
OFFICE OF THE CITY CLERK  
ROOM 395, CITY HALL  
LOS ANGELES, CALIFORNIA 90012  
CALIFORNIA ENVIRONMENTAL QUALITY ACT

PROPOSED **NEGATIVE DECLARATION**  
(Article V- City CEQA Guidelines)

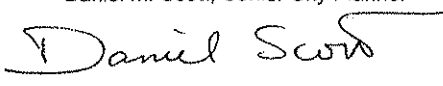
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                             |                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|
| <b>LEAD AGENCY</b><br>LOS ANGELES CITY PLANNING DEPARTMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                             | <b>COUNCIL DISTRICTS</b><br>CD 12, CD 7, and CD 2 |
| <b>PROJECT TITLE</b><br>Change of Organization or reorganization pursuant to the Cortese-Knox-Hertzberg Local Reorganization Act of 2000 (Title 5, Division 3, commencing with Section 56000 of the California government Code) relative to an amendment to boundaries of the Sphere of Influence for the City of Los Angeles.<br>"Sphere of Influence per CF-00-2206"                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                             | <b>CASE #</b><br>ENV-2004-7108-ND<br>CF-00-2206   |
| <b>PROJECT LOCATION</b><br>The proposed Sphere of Influence amendment area is located in north Los Angeles County, outside the existing limits of the City of Los Angeles. The general boundaries of the sphere are west to east, unincorporated areas near Dayton Canyon northward along the Ventura County line to the ridge line of the Santa Susanna Mountains, turning eastwardly along the ridge line of the Santa Susanna Mountains to the limits of the City of Santa Clarita at the Sierra Highway, and following the limits to the south and then east, and continuing to follow the ridge line eastward to and along the boundary of the Angeles National Forest, and turning southward to a terminus south of Little Tujunga Road. The project area is served by Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road. Undeveloped National Forest lands lie to the east of the proposed sphere boundary. To the south is the City of Los Angeles, whose northern boundary is developed primarily with single family residential dwellings to the west of Interstate 5, and light industrial development to the east. West of the proposed project area is the County of Ventura, developed with agricultural uses and scattered single family dwelling units. To the northwest of the project area are the undeveloped Santa Susanna Mountains that separate the San Fernando and Simi Valleys. |                                                                                                                                                             |                                                   |
| <b>PROJECT DESCRIPTION</b><br>The project is a plan for modification to the adopted sphere in order to establish the probable ultimate physical boundaries and urban service area of the City of Los Angeles. The plan reflects the most efficient provision of future services including police, fire and utilities, and establishes who would have responsibility to provide such services. It is not an annexation nor initiation of annexation proceedings and does not change jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use. The proposed project covers 19,242 acres, or slightly more than 30 square miles.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                             |                                                   |
| <b>NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                             |                                                   |
| <b>FINDING:</b><br><br>The City Planning Department of the City of Los Angeles has proposed that a mitigated negative declaration be adopted for this project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                             |                                                   |
| SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                             |                                                   |
| Any written comments received during the public review period are attached together with the responses of the Lead City Agency. The project decisionmaker may adopt this mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                             |                                                   |
| <b>THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                             |                                                   |
| <b>NAME OF PERSON PREPARING THIS FORM</b><br>M. Susan Whisnant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>TITLE</b><br>Planning Assistant                                                                                                                          | <b>TELEPHONE NUMBER</b><br>(818) 374-5044         |
| <b>ADDRESS</b><br>Los Angeles Department of City Planning<br>6262 Van Nuys Boulevard, Room 351<br>Van Nuys, CA 90401                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>SIGNATURE (Official)</b><br>Daniel M. Scott, Senior City Planner<br> | <b>DATE</b><br>November 18, 2004                  |

Exhibit E

# CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK  
ROOM 615, CITY HALL  
LOS ANGELES, CALIFORNIA 90012

## CALIFORNIA ENVIRONMENTAL QUALITY ACT

### INITIAL STUDY AND CHECKLIST (Article IV – City CEQA Guidelines)

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |                                                                                                                                                                                        |                                                                                                    |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|
| <b>LEAD CITY AGENCY</b><br>Los Angeles Department of City Planning                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |  | <b>COUNCIL DISTRICTS</b><br>CD 12, CD 7, and CD 2                                                                                                                                      | <b>DATE</b><br>November 18, 2004                                                                   |
| <b>RESPONSIBLE AGENCIES</b><br>Los Angeles County Local Agency Formation Commission (LAFCO)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |                                                                                                                                                                                        |                                                                                                    |
| <b>PROJECT TITLE/NO.</b><br>Change of Organization or reorganization pursuant to the Cortese-Knox-Hertzberg Local Reorganization Act of 2000 (Title 5, Division 3, commencing with Section 56000 of the California government Code) relative to an amendment to boundaries of the Sphere of Influence for the City of Los Angeles.<br>Sphere of Influence per CF-00-2206                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  | <b>CASE NO.</b><br>ENV-2004-7108-ND<br>CF-00-2206                                                                                                                                      |                                                                                                    |
| <b>PREVIOUS ACTIONS CASE NO.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  | <input checked="" type="checkbox"/> DOES have significant changes from previous actions.<br><input type="checkbox"/> DOES NOT have significant changes from previous actions.          |                                                                                                    |
| <b>PROJECT DESCRIPTION:</b><br>The project is a plan for modification to the adopted sphere in order to establish the probable ultimate physical boundaries and urban service area of the City of Los Angeles. The plan reflects the most efficient provision of future services including police, fire and utilities, and establishes who would have responsibility to provide such services. It is not an annexation nor initiation of annexation proceedings and does not change jurisdictional boundaries, regulatory authority, public or private services, tax revenue distribution, or land use. The proposed project covers 19,242 acres, or slightly more than 30 square miles.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  |                                                                                                                                                                                        |                                                                                                    |
| <b>ENVIRONMENTAL SETTING:</b><br>The project area is comprised of mountain ridges of varying heights, canyons and flat land. It is open space developed with approximately 740 single family dwelling units and multi-family dwellings that serve a population of approximately 1,550 persons including approximately 800 voters (according to the 2000 Los Angeles County Demographic prepared by the Los Angeles County Department of Regional Planning).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |                                                                                                                                                                                        |                                                                                                    |
| <b>PROJECT LOCATION</b><br>The proposed Sphere of Influence amendment area is located in north Los Angeles County, outside the existing limits of the City of Los Angeles. The general boundaries of the sphere are west to east, unincorporated areas near Dayton Canyon northward along the Ventura County line to the ridge line of the Santa Susanna Mountains, turning eastwardly along the ridge line of the Santa Susanna Mountains to the limits of the City of Santa Clarita at the Sierra Highway, and following the limits to the south and then east, and continuing to follow the ridge line eastward to and along the boundary of the Angeles National Forest, and turning southward to a terminus south of Little Tujunga Road. The project area is served by Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road. Undeveloped National Forest lands lie to the east of the proposed sphere boundary. To the south is the City of Los Angeles, whose northern boundary is developed primarily with single family residential dwellings to the west of Interstate 5, and light industrial development to the east. West of the proposed project area is the County of Ventura, developed with agricultural uses and scattered single family dwelling units. To the northwest of the project area are the undeveloped Santa Susanna Mountains that separate the San Fernando and Simi Valleys. |  |                                                                                                                                                                                        |                                                                                                    |
| <b>PLANNING DISTRICT</b><br>Chatsworth Porter Ranch, Northridge, Granada Hills-Knollwood, Sylmar, Sunland-Tujunga Lakeview Terrace- Shadow Hills-East La Tuna Canyon                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  | <b>STATUS:</b><br><input type="checkbox"/> PRELIMINARY<br><input type="checkbox"/> PROPOSED<br><input checked="" type="checkbox"/> ADOPTED: 7/14/1993, 7/10/1996, 8/6/1987, 11/18/1997 |                                                                                                    |
| <b>EXISTING ZONING</b><br>Land use designations would follow the County of Los Angeles General Plan as follows: N1 (Non-urban 1), N2 (Non-urban 2: 0.5 to 1.0 dwelling units per acre), U1 (Urban 1: 1.1 to 3.3 dwelling units per acre), Urban 2 (Urban 2: 3.4 to 6.6 dwelling units per acre), U3 (Urban 3: 6.7 to 15.0 dwelling units per acre), U4 (Urban 4: 15.1 to 40 dwelling units per acre), C (Commercial), M (Industrial), RR (Resort recreational), W (Flood way and flood plains: Special Management Area), and S (Significant Ecological Area (SEA): Special Management Area).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  | <b>MAX. DENSITY ZONING</b><br>n/a                                                                                                                                                      | <input type="checkbox"/> DOES CONFORM TO PLAN<br><input type="checkbox"/> DOES NOT CONFORM TO PLAN |
| <b>PLANNED LAND USE &amp; ZONE</b><br>No change in land use and zoning.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  | <b>MAX. DENSITY PLAN</b><br>n/a                                                                                                                                                        |                                                                                                    |

|                                                                                                                                                                                     |                                 |                                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|--------------------------------------------------------------------------------------------------------|
| <b>PLANNED LAND USE &amp; ZONE</b><br>No change in land use and zoning.                                                                                                             | <b>MAX. DENSITY PLAN</b><br>n/a | <input type="checkbox"/> DOES CONFORM TO PLAN<br><br><input type="checkbox"/> DOES NOT CONFORM TO PLAN |
| <b>SURROUNDING LAND USES</b><br>Undeveloped National Forest lands, single family residential dwellings, light industrial development, agricultural lands, Sunshine Canyon landfill. | <b>PROJECT DENSITY</b><br>n/a   | <input checked="" type="checkbox"/> NO DISTRICT PLAN                                                   |

### DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Daniel M. Scott  
SIGNATURE

Senior City Planner  
TITLE

### EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," cross referenced).

- a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
  - 7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
  - 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
  - 9) The explanation of each issue should identify:
    - a) The significance criteria or threshold, if any, used to evaluate each question; and
    - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

---

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- |                                                 |                                                        |                                                             |
|-------------------------------------------------|--------------------------------------------------------|-------------------------------------------------------------|
| <input type="checkbox"/> Aesthetics             | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Hydrology/Water Quality       | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Air Quality            | <input type="checkbox"/> Land Use/Planning             | <input type="checkbox"/> Transportation/Traffic             |
| <input type="checkbox"/> Biological Resources   | <input type="checkbox"/> Mineral Resources             | <input type="checkbox"/> Utilities/Service Systems          |
| <input type="checkbox"/> Cultural Resources     | <input type="checkbox"/> Noise                         | <input type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Geology/Soils          | <input type="checkbox"/> Population/Housing            |                                                             |

---

## INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

### BACKGROUND

#### PROPONENT NAME

City of Los Angeles

#### PHONE NUMBER

(818) 374-5069

#### PROPONENT ADDRESS

6262 Van Nuys Boulevard, Room 351  
Van Nuys, CA 91401-2709

#### AGENCY REQUIRING CHECKLIST

Los Angeles Department of City Planning

#### DATE SUBMITTED

November 18, 2004

#### PROPOSAL NAME (If Applicable)

Sphere of Influence per CF-00-2206

---

**ENVIRONMENTAL IMPACTS**

(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

|                                                                                                                                                                                                                                                                                                                                                                                                   | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| <b>I. AESTHETICS.</b> Would the project:                                                                                                                                                                                                                                                                                                                                                          |                                   |                                                              |                                 |                                     |
| a. Have a substantial adverse effect on a scenic vista?                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?                                                                                                                                                               | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. Substantially degrade the existing visual character or quality of the site and its surroundings?                                                                                                                                                                                                                                                                                               | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?                                                                                                                                                                                                                                                                             | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| <b>II. AGRICULTURAL RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project: |                                   |                                                              |                                 |                                     |
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?                                                                                                                                                               | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| b. Conflict the existing zoning for agricultural use, or a Williamson Act Contract?                                                                                                                                                                                                                                                                                                               | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?                                                                                                                                                                                                                                     | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| <b>III. AIR QUALITY.</b> The significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:                                                                                                                                                                                  |                                   |                                                              |                                 |                                     |
| a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?                                                                                                                                                                                                                                                                                                          | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?                                                                                                                                                                                                                                                                                | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                                                                | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| c. Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (ozone, carbon monoxide, & PM 10) under an applicable federal or state ambient air quality standard? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Expose sensitive receptors to substantial pollutant concentrations?                                                                                                                                                         | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Create objectionable odors affecting a substantial number of people?                                                                                                                                                        | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**IV. BIOLOGICAL RESOURCES.** Would the project:

|                                                                                                                                                                                                                                                                                                              |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service ?                                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?                                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?                                                                                                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**V. CULTURAL RESOURCES:** Would the project:

|                                                                                                                   |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|-------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|

|                                                                                                                      | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|----------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?              | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Disturb any human remains, including those interred outside of formal cemeteries?                                 | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**VI. GEOLOGY AND SOILS.** Would the project:

a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving :

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii. Strong seismic ground shaking?

iii. Seismic-related ground failure, including liquefaction?

iv. Landslides?

b. Result in substantial soil erosion or the loss of topsoil?

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

|                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**VII. HAZARDS AND HAZARDOUS MATERIALS.** Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials

|                          |                          |                          |                                     |
|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--------------------------|--------------------------|--------------------------|-------------------------------------|



|                                                                                                                                                                                                                                                                  | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?                                                                  | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?                                                                                                  | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?                                   | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?                                                                                                          | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?                                                                                                                                        | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?                                             | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**VIII. HYDROLOGY AND WATER QUALITY.** Would the proposal result in:

|                                                                                                                                                                                                                                                                                                                                                                                      |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Violate any water quality standards or waste discharge requirements?                                                                                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?                                                                                                                                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

|                                                                                                                                                                                                                                                                           | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?                                                                                     | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. Otherwise substantially degrade water quality?                                                                                                                                                                                                                         | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?                                                                                                              | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| h. Place within a 100-year flood plain structures which would impede or redirect flood flows?                                                                                                                                                                             | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?                                                                                                        | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| j. Inundation by seiche, tsunami, or mudflow?                                                                                                                                                                                                                             | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**IX. LAND USE AND PLANNING.** Would the project:

|                                                                                                                                                                                                                                                                                                 |                          |                          |                          |                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Physically divide an established community?                                                                                                                                                                                                                                                  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Conflict with any applicable habitat conservation plan or natural community conservation plan?                                                                                                                                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**X. MINERAL RESOURCES.** Would the project:

|                                                                                                                                                                        |                          |                          |                          |                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XI. NOISE.** Would the project:

|                                                                                                                                                                                                                                                                     | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?                                                                               | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                              | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                                      | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                          | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?                                                                                                      | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**XII. POPULATION AND HOUSING.** Would the project:

|                                                                                                                                                                                                          |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?                                                                                               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XIII. PUBLIC SERVICES.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

|                       |                          |                          |                          |                                     |
|-----------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Fire protection?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

|                                                   | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|---------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| c. Schools?                                       | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Parks?                                         | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Other governmental services (including roads)? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

#### XIV. RECREATION.

|                                                                                                                                                                                                                |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

#### XV. TRANSPORTATION/CIRCULATION. Would the project:

|                                                                                                                                                                                                                                                                                        |                          |                          |                          |                                     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to ratio capacity on roads, or congestion at intersections)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?                                                                                                                   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?                                                                                                                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?                                                                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Result in inadequate emergency access?                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Result in inadequate parking capacity?                                                                                                                                                                                                                                              | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g. Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?                                                                                                                                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

**XVI. UTILITIES. Would the project:**

|                                                                                                                                                                                                                                   | Potentially Significant<br>Impact | Potentially Significant<br>Unless Mitigation<br>Incorporated | Less Than Significant<br>Impact | No Impact                           |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|--------------------------------------------------------------|---------------------------------|-------------------------------------|
| a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?                                                                                                                               | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                            | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                                      | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?                                                                             | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?                                                                                                            | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |
| g. Comply with federal, state, and local statutes and regulations related to solid waste?                                                                                                                                         | <input type="checkbox"/>          | <input type="checkbox"/>                                     | <input type="checkbox"/>        | <input checked="" type="checkbox"/> |

**XVII. MANDATORY FINDINGS OF SIGNIFICANCE.**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                          |                          |                          |                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Does the project have impacts which are individually limited, but cumulatively considerable?<br>("Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).                                                                                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?                                                                                                                                                                                                                                                                                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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## **DISCUSSION OF THE ENVIRONMENTAL EVALUATION** (Attach additional sheets if necessary)

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The list of impact categories and subcategories were prepared pursuant to the public Resources Code and the California Environmental Quality Act (CEQA). [Please see the following sections of the Public Resources Code and CEQA Guidelines: Public Resources code section 21082.2 (Significant effect based on substantial evidence, not public controversy or speculation), CEQA sections 15063 (Initial Study), 15064 (Determining the Significance of Environmental Effects Caused by a Project), 15065 (Mandatory Findings of Significance), 15070 (Decision to Prepare a Negative or Mitigated Negative Declaration; ND/MND), 15071 (Contents {of ND/MND}) and 15047 (Consideration and Adoption of a Negative Declaration or Mitigated Negative Declaration)]

The Public Resources Code and CEQA Guidelines explicitly indicate "substantial evidence" as a basis for determining the significance of impacts on the environment caused by a Project. Public Resources code section 21082.2 (c) states - "argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to, or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." Public Resources Code section 21082.2 (b) states - "The existence of public controversy over the environmental effects of a project shall not require preparation of an environmental impact report if there is no substantial evidence, in light of the whole record before the lead agency, that the project may have a significant effect on the environment" (also see CEQA Guidelines sections 15382 and 15384).

Furthermore, the determination to prepare a Negative or Mitigated Negative Declaration (ND/MND) or an Environmental Impact Report (EIR) is reached by the examination of certain facts and supporting data, which clearly support the method of disclosure (i.e. ND/MND, EIR), alternatives, and mitigation of environmental impacts. The following criteria must be evident when an EIR is required by the Lead Agency (CITY OF LOS ANGELES) per CEQA Guidelines section 15065 (Mandatory Findings of Significance); a project will have a significant effect if it will:

- Substantially degrade environmental quality
- Substantially reduce fish or wildlife habitat.
- Cause a fish or wildlife habitat to drop below self-sustaining levels.
- Threaten to eliminate a plant or animal community.
- Reduce number, or restrict range of a rare, threatened, or endangered species.
- Eliminate important examples of major periods of California history or prehistory.
- Achieve short-term goals to the disadvantage of long-term goals.
- Result in environmental effects that are individually limited but cumulatively considerable.
- Result in environmental effects that will cause substantial adverse effects on human beings.

| PREPARED BY       | TITLE              | TELEPHONE #    | DATE          |
|-------------------|--------------------|----------------|---------------|
| M. Susan Whisnant | Planning Assistant | (818) 374-5044 | November 2004 |

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## **Exhibit F: Sphere of Influence Amendment Application**

**LOS ANGELES SPHERE OF INFLUENCE AMENDMENT APPLICATION**  
**(Pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act**  
**of 2000, Division 3, Title 5 Commencing with Section 56000,**  
**of the Government Code)**

**TO: LOCAL AGENCY FORMATION COMMISSION**

County of Los Angeles  
Room 383, Hall of Administration  
500 West Temple Street  
Los Angeles, California 90012

**DESIGNATION OF PROPOSAL:** Amendment to Sphere of Influence

**AFFECTED CITY/DISTRICT:** City of Los Angeles

**RELATED JURISDICTIONAL CHANGES:** None

**GENERAL LOCATION OF PROPOSAL:** The proposed Sphere of Influence amendment area is located in north Los Angeles County, outside the existing limits of the City of Los Angeles. The general boundaries of the sphere are west to east, unincorporated areas near Dayton Canyon northward along the Ventura County line to the ridge line of the Santa Susana Mountains, turning eastwardly along the ridge line of the Santa Susana Mountains to the limits of the City of Santa Clarita at the Sierra Highway, and following the limits to the south and then east, and continuing to follow the ridge line eastward to and along the boundary of the Angeles National Forest, and turning southward along the limits of the City of Los Angeles to a terminus south of Little Tujunga Road.

**THOMAS GUIDE PAGE(S):** LA County: 480, 481, 482, 499, 500, 503, 504, 529,  
559, 4640, 4641, 4642  
Ventura County: 367, 479

**PROPOSAL INITIATED BY:** ☒ **Resolution** ☐ **Landowner/Voter Petition**

**APPLICANT:** City of Los Angeles  
6262 Van Nuys Blvd., Room 351  
Van Nuys, CA 91401-2709

**SIGNED:** \_\_\_\_\_  
Daniel M. Scott, Senior City Planner

**TELEPHONE:** (818) 374-5069

**DATE:** May 4, 2005

**Exhibit F**



## I. THE SUBJECT AREA

### A. GENERAL DESCRIPTION

1. **Acres or square miles:** 19,242 acres or slightly more than 30 square miles.
2. **Major highways and streets serving the area:** The proposed area is served by Interstate 5, Interstate 405, Interstate 210, State Highway 14, State Highway 118, and Little Tujunga Road.
3. **Topography:** Mountain ridges of varying heights; canyons and flat land make up the general topography of the area.
4. **Physical boundaries):**  
Santa Susana Mountain ridge line.

### B. POPULATION AND HOUSING

1. **Estimated population:** The estimated population for the proposed Sphere of Influence outside of the City limits is approximately 1,550 persons.
2. **Number of registered voters:** Approximately 800 voters.  
(2000 Los Angeles County Demographic Profile Prepared by the Los Angeles County Department of Regional Planning)
3. **Number and type of dwelling units:** The area within the proposed Sphere of Influence outside the incorporated city limits contains approximately 740 single-family and multi-family dwelling units. The area contains housing that is primarily single family dwelling units.

### C. LAND USE AND ZONING

1. **Existing land use in the subject area:** The existing land uses in the subject area are open space, with scattered single- family homes and multi-family homes.
2. **Planned land use designations in the surrounding area:**  
Land use designations will not change as a result of the amendment. The County of Los Angeles General Plan covers the area included within the proposed amendment area to the sphere of influence. The designations include: N1 (Non-urban 1), N2 (Non-urban 2: 0.5 to 1.0 dwelling units per acre), U1 (Urban 1: 1.1 to 3.3 dwelling units per acre), Urban 2 (Urban 2: 3.4 to 6.6 dwelling units per acre), U3 (Urban 3: 6.7 to 15.0 dwelling units per acre), U4 (Urban 4: 15.1 to 40 dwelling units per acre), C (Commercial), M (Industrial), RR (Resort recreational), W (Floodway and floodplains: Special Management Area), and S (Significant Ecological Area [SEA]: Special Management Area).

## II THE PROPOSAL

- A. **Reasons for initiation of this proposal:** The Sphere of Influence Study was prepared by the City of Los Angeles to plan for plan for the probable ultimate physical boundaries and urban service area of the a potion of the northern border of the City of Los Angeles. It is presented as an informational and advocacy tool to assist members of the Local Agency Formation Commission (LAFCO) in making their determinations pursuant to Government Code Section 56076.
- B. **Alternate courses of action:** Alternate course of action are denial of the proposed sphere and continuation of the of the current sphere with a border coterminous with the limits of the City of Los Angeles.
- C. **Services and/or costs to residents or landowners in the area:** Services and/or costs to residents or landowners in the area would not be increased, reduced, or eliminated as a result of this proposal.
- D. **Terms or conditions requested as part of this proposal:** Standard LAFCO conditions are anticipated and acceptable.

## III. GENERAL

- A. **Names and addresses of persons, organization or agencies known to you who may be opposed to this proposal:**  
Carlyle W. Hall, Jr. for Las Lomas  
Akin Gump Strauss Hauer & Feld  
2029 Century Park East, Suite 2400  
Los Angeles, CA 90067-3012  
(310) 728-3242
- B. **Names and addresses of persons who are to receive notice of hearing, staff report, and minutes:**  
  
City of Los Angeles, Planning Department  
c/o Susan Whisnant, Planning Assistant  
6262 Van Nuys Blvd. Room 351  
Van Nuys, CA 91401-2709  
  
John Wickham, CLA  
City Hall 255  
200 North Spring Street  
Los Angeles, CA 90012

Dale Thrush, CD 2  
City Hall 475  
200 North Spring Street  
Los Angeles, CA 90012

Tom Henry, CD 3  
City Hall 450  
200 North Spring Street  
Los Angeles, CA 90012

Dan Rosales, CD 7  
City Hall 465  
200 North Spring Street  
Los Angeles, CA 90012

Kevin Keller, CD 11  
City Hall 415  
200 North Spring Street  
Los Angeles, CA 90012

Phyllis Winger, CD 12  
City Hall 405  
200 North Spring Street  
Los Angeles, CA 90012

**Exhibit G: Resolution to Initiate Proceedings to Adopt an  
Amended Sphere of Influence**

Resolution No. \_\_\_\_\_

A RESOLUTION OF THE APPLICATION BY THE  
CITY COUNCIL OF THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES,  
STATE OF CALIFORNIA,  
REQUESTING THE LOCAL AGENCY FORMATION COMMISSION OF THE COUNTY  
OF LOS ANGELES TO  
INITIATE PROCEEDINGS TO ADOPT AN AMENDED SPHERE OF INFLUENCE FOR,  
AND AS PROPOSED BY, THE CITY OF LOS ANGELES.

WHEREAS, the City of Los Angeles desires to initiate proceedings pursuant to the  
Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, Division 3,  
commencing with Section 56000 of the California Government Code;

WHEREAS, this proposal is consistent with the spirit and intent of sections 56427 and  
56428 of the California State Code;

WHEREAS, the territory proposed to be included in this sphere of influence is set forth  
in Exhibit "A", attached hereto and by this reference incorporated;

WHEREAS, the City has prepared and adopted a comprehensive general plan for the  
City and generally all the territories within the proposed sphere of influence area;

WHEREAS, the City Council of the City of Los Angeles conducted a public meeting on  
(*insert date*) pursuant to applicable law, to consider the proposed sphere of influence;

**Exhibit G**

WHEREAS, the reasons for this proposed sphere of influence are as follows:

3. Facilitate orderly growth in the unincorporated areas adjacent to the City of Los Angeles;
4. Coordinate property development standards and encourage timely provision of adequate and essential services such as streets, sewer, water, police and fire protection, parks and recreation, flood control, and solid waste disposal, as urbanization of unincorporated areas occurs;
5. Promote cooperative planning between the City of Los Angeles and the County of Los Angeles, various public/private service entities, and major landowners, and so facilitate proper implementation of their respective general or master plans;
6. Assist all government agencies and private entities in planning and scheduling the logical, orderly, and economic extension of their facilities and services, thus avoiding expensive and unnecessary duplication of effort;
7. Promote, assist, and enhance property owners' ability to plan comprehensively, and with reasonable assurance, for the ultimate use and development of their lands; and

WHEREAS, the City Council of the City of Los Angeles, California, has considered all evidence, oral and documentary, and is advised in the premises.

NOW, THEREFORE, BE IT RESOLVED, that the City Council of the City of Los Angeles, California, does hereby determine and find as follows:

Section 1. This resolution is hereby adopted and approved by the City Council, and the Local Agency Formation Commission of the County of Los Angeles is hereby requested to initiate proceedings to adopt an amended sphere of influence as mapped in Exhibit "A", which is incorporated herein by this reference, according to the terms and conditions stated above, and in the manner provided by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

Section 2. The City Council hereby directs and authorizes the City Clerk of the City of Los Angeles to file a certified copy of this resolution with the Executive Officer of the Local Agency Formation Commission of the County of Los Angeles.

Section 3. The City Clerk shall certify the adoption of this resolution.

PASSED, APPROVED, AND ADOPTED this \_\_\_\_\_ day of \_\_\_\_\_, 2005.

\_\_\_\_\_  
James K. Hahn, Mayor

ATTEST:

\_\_\_\_\_  
J. Michael Carey, City Clerk

STATE OF CALIFORNIA       )  
COUNTY OF LOS ANGELES   )  
CITY OF LOS ANGELES       )

I, J. Michael Carey, City Clerk of the city of Los Angeles, do hereby certify that the foregoing Resolution was duly adopted by the City Council of the City of Los Angeles.

[Back](#)[Edit](#)**File Number**

00-2206

**Last Changed Date**

04/08/2005

**Title**

SPHERE OF INFLUENCE - PORTIONS OF SAN FERNANDO VALLEY

**Initiated by**

Bernson Mover 2000 / Galanter

**Subject**

Motion - The City of Santa Clarita recently submitted a sphere of influence application to the Local Agency Formation Commission (LAFCO) that claims portions of the San Fernando Valley. LAFCO will soon consider Santa Clarita's proposal. The City has indicated to LAFCO that the Santa Clarita sphere should not include any part of the San Fernando Valley, and that the southern boundary of the sphere should be drawn at the crest of the San Gabriel and Santa Susanna mountains.

The City of Los Angeles sphere of influence is currently coterminous with the City boundary, though large areas of the San Fernando Valley remain unincorporated. The City should apply to LAFCO for a sphere that includes these unincorporated and largely undeveloped areas.

The intent of a sphere of influence is to determine the most efficient provision of services, including police, fire, and utilities. The City of Los Angeles clearly has the greatest ability to provide these services and more to the unincorporated areas of the San Fernando Valley. Should these areas ever develop, the City would have responsibility to provide services and should have some influence over how these development decisions are made.

THEREFORE MOVE that the City of Los Angeles submit an application to LAFCO for a Sphere of Influence that includes the unincorporated portions of the San Fernando Valley.

FURTHER MOVE that the Council direct the City Planning Dept with assistance from the Chief of Legislative Analyst to prepare an application to LAFCO for a Sphere of Influence and report back to the P&LUM Comt within 45 days.

REFER TO COUNCIL FILE 05-0671

**Council District****Date Received**

11/07/2000

**File History**

11-7-00 - This day's Council session

11-7-00 - File to Calendar Clerk for placement on next available Council agenda

11-14-00 - Council Action - Motion ADOPTED

11-20-00 - File in files

[Back](#)[Edit](#)



J. MICHAEL CAREY  
City Clerk

FRANK T. MARTINEZ  
Executive Officer

When making inquiries  
relative to this matter  
refer to File No.

00-2206

# CITY OF LOS ANGELES

CALIFORNIA



RICHARD J. RIORDAN  
MAYOR

Office of the  
CITY CLERK  
Council and Public Services  
Room 615, City Hall  
Los Angeles, CA 90012  
Council File Information - (213) 485-5703  
General Information - (213) 485-5705  
Fax: (213) 847-0636  
Fax: (213) 485-8944

HELEN GINSBURG  
Chief, Council and Public Services Division

November 16, 2000

Honorable Richard Riordan, Mayor  
Council member Bernson  
Council member Galanter  
Planning Department  
Chief Legislative Analyst

Office of Administrative  
and Research Services  
City Attorney  
Planning and Land Use Management  
Committee Clerk, Attn: J. White

RE: SUBMITTING AN APPLICATION TO THE LOCAL AGENCY FORMATION COMMISSION  
(LAFCO) FOR A SPHERE OF INFLUENCE THAT INCLUDES THE UNINCORPORATED  
PORTIONS OF THE SAN FERNANDO VALLEY

At the meeting of the Council held November 14, 2000, the following  
action was taken:

|                                                   |               |
|---------------------------------------------------|---------------|
| Attached report adopted .....                     | _____         |
| Attached motion (Bernson - Galanter) adopted..... | _____ X _____ |
| Attached resolution adopted ().....               | _____         |
| Mayor concurred.....                              | _____         |
| FORTHWITH.....                                    | _____         |
| Ordinance adopted.....                            | _____         |
| Ordinance number.....                             | _____         |
| Effective date.....                               | _____         |
| Publication date.....                             | _____         |
| Mayor vetoed.....                                 | _____         |
| Mayor approved.....                               | _____         |
| Mayor failed to act - deemed approved.....        | _____         |

*J. Michael Carey*

City Clerk  
crm

steno\002206



18

|                                                                            |            |     |
|----------------------------------------------------------------------------|------------|-----|
| TO CITY CLERK FOR PLACEMENT ON NEXT<br>REGULAR COUNCIL AGENDA TO BE POSTED | NOV 7 2000 | #55 |
|----------------------------------------------------------------------------|------------|-----|

**MOTION**


The City of Santa Clarita recently submitted a sphere of influence application to the Local Agency Formation Commission (LAFCO) that claims portions of the San Fernando Valley. LAFCO will soon consider Santa Clarita's proposal. The City has indicated to LAFCO that the Santa Clarita sphere should not include any part of the San Fernando Valley, and that the southern boundary of the sphere should be drawn at the crest of the San Gabriel and Santa Susanna mountains.

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I THEREFORE MOVE that the City of Los Angeles submit an application to LAFCO for a Sphere of Influence that includes the unincorporated portions of the San Fernando Valley.

I FURTHER MOVE that the Council direct the City Planning Department with assistance from the Office of the Chief Legislative Analyst to prepare an application to LAFCO for a Sphere of Influence and report back to the Planning and Land Use Management Committee within 45 days.

Presented by:   
Hal Bernson  
Councilman, 12<sup>th</sup> District

Seconded by: 



**motion  
ADOPTED**

NOV 14 2000  
LOS ANGELES CITY COUNCIL

COUNCIL VOTE

14-Nov-00 10:42:14 AM, #5

Items for which Public Hearings Have Not Been Held - Items 7-21

Voting on Item(s): 12-21

Roll Call

|               |        |
|---------------|--------|
| BERNSON       | Yes    |
| CHICK         | Yes    |
| FEUER         | Yes    |
| GALANTER      | Absent |
| GOLDBERG      | Absent |
| HERNANDEZ     | Absent |
| HOLDEN        | Absent |
| MISCIKOWSKI   | Yes    |
| PACHECO       | Yes    |
| PADILLA       | Yes    |
| RIDLEY-THOMAS | Yes    |
| *SVORINICH    | Yes    |
| WACHS         | Yes    |
| WALTERS       | Yes    |
| FERRARO       | Absent |

Present: 10, Yes: 10 No: 0