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PCPOA

VIA EMAIL, FACSIMILE AND
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October 13, 2017

Mayor Cameron Smyth and Members of the City Council
City of Santa Clarita
23920 Valencia Blvd., Suite 300
Santa Clarita, CA 91355

Re: *Objection by Placerita Canyon Property Owner's Association to the Lyons Avenue DEIR Proposed At-Grade Rail Crossing and its relationship to the Dockweiler Drive Alignment Project ("Dockweiler Project")*

Dear Mayor Smyth and Council Members:

This office represents the interests of the Placerita Canyon Property Owner's Association ("PCPOA") and its members in regard to their opposition to the above-referenced proposed Lyons Avenue At-Grade Rail Crossing Project ("Lyons Avenue Project"), and its nexus to the proposed Dockweiler Project. The Lyons Avenue Project is required to be tied to the proposed Dockweiler Project.

As a first point, the Dockweiler Project is neither wanted nor needed especially by that sector of the Santa Clarita that will be the most significantly and severely adversely impacted, namely, PCPOA. The approval of the Dockweiler Project and the Lyons Avenue Crossing Project are in derogation to the protections intended by the Placerita Canyon Special Standards District, enacted "to protect, maintain, preserve and enhance the secluded, rural equestrian character of the community." In fact, if and when constructed, the Dockweiler Project will eviscerate the protections intended Placerita Canon Special Standards District to protect the community against uncontrolled development in the future, and to protect against harm and damage to the existing community, its structures, and its residents.

The City is proposing to construct the Proposed Dockweiler Drive Alignment Project directly through the heart and in violation of the Placerita Canyon Special Standards District, by extending Dockweiler Avenue to extend it to Lyons Avenue, across the SCRRA railroad tracks, essentially connecting Sierra Highway (even though it will never be connected to an onramp to the 14 Freeway because it is too close to the existing freeway connections at Placerita Canyon and Newhall Avenue), by formalizing Dockweiler into becoming a major bypass to divert and redirect tens of thousands of cars daily from the 14 Freeway directly through the Placerita Special Standards District, across the proposed Lyons Avenue Crossing, and into the commercial center of Santa Clarita, then connecting on to the I-5 Freeway. (See previous report of Arthur L. Kassan, P.E., dated May 26, 2010, submitted by PCPOA, incorporated herein by this reference.)

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The City attempts to sanctify the intended Dockweiler Project in conjunction with the Lyons Avenue Project premised on its contention that they are consistent with the General Plan which, of course, presupposes that the General Plan was flawless, which it clearly is not because it never proffered a specific combined Dockweiler / Lyons Project which was subjected or has met current CEQA standards. The City has admitted such in its DEIR.¹

As a bureaucratic diversion intended to dilute any opposition to the Dockweiler Project and its eventual intended tie to the Lyons Crossing, purported “alternatives” to the Lyons Avenue Crossing have been referenced in the form of crossings at 13th Street and Market Street, neither of which provides any support for the Dockweiler Project and its intended resulting flow of thousands of additional vehicles through the Placerita Specific Standards District.

Aside from the major intended increase in traffic volume on Dockweiler, the proposed construction on Dockweiler itself will not meet current highway safety standards, as the gradient of 11.5% (based on the City’s own analyses) far exceeds the legally allowable grade of less than 6%, immediately disqualifying Dockweiler from available federal and state funding, causing the City to have to bear the sole cost and expense of millions of dollars to construct a substandard cross-town highway. In short, the Dockweiler Project effectively drops straight down a cliff to reach the river grade before crossing the railroad. Even more egregious is that the Dockweiler Project which would funnel these thousands of additional vehicles would be on a roadway that would be only 10-15 feet from some of the existing structures in an established multiple family and condominium community.²

An even further defect on the list of defective analyses is the fact that the proposed Lyons Crossing will expose the railroad tracks to erosion and flood damage, as the constriction of the water course by the proposed Lyons Crossing would raise the water level under high water storm flows that overtop the elevation of the railroad.³ Placerita Canyon is already susceptible to poor

¹ “The proposed alignment of Dockweiler Drive through this existing residential neighborhood would not be consistent with the alignment identified within the Circulation Element and would not be compatible with respect to public safety and local residential street standards”

² If Dockweiler is constructed with two lanes of traffic in each direction, it would be extremely close to the existing condominiums at the top of the hill, even though former Community Development Director Paul Brotzman deceptively pledged to those residents that the planned expansion would never be built.

³ Mike Hennaway of City of Santa Clarita stated in a December 14, 2009 email to Craig Kwasiewski, Senior Hydrologist / Project Engineer with HMK Engineering, that “...the profile of the (proposed Lyon’s) bridge ... is below the Water Surface Elevation (“WSE”) for both a 100 year clear flow and a 50 year burned-and-bulked flow,” which means that the bridge would be beneath the level of flood waters in Newhall Creek, and in the event of a heavy rainstorm, the Placerita Canyon community of 450+ homes would be cut off from evacuation and emergency support services by floodwaters cresting over the bridge. The overflows would also inundate the Downtown Newhall area, and the section in front of the new Newhall Library would become a lake due to the built-up roadway required to be raised to meet the top of the tracks for an at-grade Crossing at Lyons.

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runoff creating flooding on 12th Street near Placeritos, 13th Street, and other areas. Such constriction of water flow in the water course will exacerbate the already-existing water flow, flooding, and drainage issues.

Yet another unexplored issue relating to any expansion of Dockweiler is MWD's announced intention to expand its services with its planned 20 foot in diameter parallel feed pipe through the Dockweiler alignment.

Simply, the Lyons Crossing Project does not and cannot exist in the abstract without also fully considering and evaluating of the corresponding impacts of the proposed Dockweiler Project, because they are completely integrated in their intended purpose and use: piecemealing of contemplated Projects to prevent their full analyses and evaluation in their total context is a direct violation of the fundamental requirements of CEQA. The City has failed to comply with CEQA in not completely combining the environmental analyses of Lyons Crossing Project along with the Dockweiler Project.

There can be no viable (or legal) alternative Crossing that can be proposed unless and until the full context of the Dockweiler Project is included in the environmental review. The lesser of evils---albeit still legally defective in the present context would be the Market Street Alternative, as it would be a better solution to address the access and circulation issues requiring a crossing. That Crossing already exists and could be expanded, and Market Street has the advantage of having access from other parts of Railroad Street prior to the crossing at Railroad/Newhall/Main St. (Pine and Arch St.) The 13th Street alternative will never receive PUC approval.

In addition to its objections stated herein, PCPOA restates its previously asserted objections to the proposed Lyons Crossing Project, as follows:

Topic 1: Aesthetics

There will be significant impact to the scenic vistas and it will make significant impact to the rural equestrian nature of the area. An at-grade crossing will mean raising the road bed five to six feet. This will impede the walkability in the section of Downtown Newhall currently undergoing redevelopment, and will virtually bury the historic jailhouse located almost adjacent to the proposed Crossing. The proposed Project will create light, noise and visual blight in a Special Standards District in which these uses are restricted.

Topic 2: Agricultural Resources

The proposed at-grade Crossing will alter an area near equestrian facilities. Tractors and other farm equipment are common on local streets; they also use the crossing presently at 13th Street. Placerita Canyon is a Rural Equestrian Community, specifically so designated as a Special Standards District in Santa Clarita's UDC.

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Topic 3: Air quality

The Santa Clarita commercial center area is already out of compliance with Federal and State clean air standards, and there will be at least three additional elements that have to be considered: more trains, more traffic, and longer waits for each vehicle to make the crossing, which will create even more air pollution in an area that is already suffering.

Under the Global Warming Solutions Act of 2006, California emissions must be reduced to 1990 levels by the year 2020. The heavier volume of traffic in the heart of the commercial and governmental center of Santa Clarita, combined with longer wait times, will result in more emissions not less in an already non-attainment area.

Topic 4: Biological Resources

The proposed Lyons Avenue at-grade Crossing will adversely affect Newhall Creek, an identified "blue line stream" under Fish and Game jurisdiction, and also likely under federal Fish & Wildlife jurisdiction since Newhall Creek would be considered to be "waters of the United States." To accommodate this Crossing and its required elevation change to be at-grade, Newhall Creek would need to be bridged and channeled. Newhall Creek is a natural highway for wildlife, both large and small, including deer, cougars, bobcats, coyotes, skunks, opossums, rabbits, mice, squirrels, snakes, lizards, raptors, owls, turkey vultures, road runners and other species.

The local oak trees are also highly protected under Santa Clarita's ordinances; changing the water flow will be a threat to many of these cherished denizens, which has to be evaluated. There are many City-built hiking and equestrian trails in the area. Changes to the creek bed will affect these crossings and uses.

The proposed at-grade Lyons Crossing will affect the ultimate flow of the Santa Clara River, of which Newhall Creek is a tributary. Full current hydrology studies must be conducted to determine the capacity status of all drains, channels and related facilities.

Topic 5: Cultural Resources

The historic Old Jail building in Santa Clarita is a cultural icon that will be threatened with the ramping up of Lyons Avenue to make it an at-grade railroad crossing.

Topic 6: Geology

The area of the at-grade crossing is a known seismically active area and subject to liquefaction.

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Topic 7: Hazards and Hazardous Materials

San Fernando Road (now, Railroad Ave.) is approved for the transporting of hazardous materials. The area is slated for industrial development and will result in hazardous materials crossing the railroad tracks at Lyons Avenue. Trains will also be carrying hazardous materials. Heavy vehicle traffic congestion will increase the potentiality of vehicle interference, and thus collisions and spills.

Topic 8: Hydrology

FEMA studies show that much of Placerita Canyon as well as much of the area affected by the proposed Lyons Avenue at-grade Crossing and extension to Dockweiler to be in a floodway. An EIR is required to analyze and to show how that designation will impact all traffic flow and how roads must be designed to avoid the areas of concern. A FEMA letter sent to the City dated August 9, 2013 confirms the vulnerability of Placerita Canyon to flooding.

The Crawford, Multari & Clark study (April 10, 2008) indicates "Potentially Significant Impacts" to all aspects of Hydrology and Water Quality. The Lyons Avenue Project may violate water quality standards and waste discharge requirements, affects groundwater supplies, alter the existing drainage pattern through the alteration of the course of a stream, and affect erosion or siltation. Further, the Project may also affect the overall drainage pattern and increase runoff, causing flooding both on and off-site. This is in an area in which the City has previously warned residents in writing to pay particular attention to protecting themselves from the danger of flooding. (October 2012 letter.)

Topic 9: Land Use and Planning

Previously applied for/approved projects affecting this proposed Project include Master's College and Placerita Baptist Church expansions, and expansions for Our Lady of Perpetual Help Catholic Church. The impact of the Compass Project, a high-density transit oriented development, must be weighed along with traffic from Dockweiler and Valle del Oro that previously used Newhall Avenue to access Lyons, because much of that traffic will be diverted this proposed at-grade Crossing at Lyons.

The Lyons at-grade Crossing will facilitate new development which will conflict with Placerita Canyon's Special Standards District which was promised to residents and written into the UDC to maintain the rural equestrian nature of Placerita Canyon. The Special Standards District has no sidewalks, and no curbs or gutters, and special lighting must be designed to be compatible with the area. Such potential development must also be anticipated and evaluated.

Topic 10: Mineral Resources

The area served by the proposed at-grade Crossing is adjacent to an oil production area, whose trucks will traverse the Crossing.

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Topic 11: Noise

The design and construction of the proposed at-grade Lyons Crossing, including the lowering of some of the ridgelines called for in OVOV, would allow more noise from trains and traffic to penetrate the entire area. The Crossing remove or reduce some of the existing physical barriers to noise. The area would clearly become a traffic "hub" if the Lyons Crossing were approved, as it would connect with other major roads throughout the City. The Lyons Avenue at-grade Crossing would carry the highest crossing traffic volume in the Santa Clarita Valley

With the possibility of five at-grade Crossings (Newhall Ave., Market St., Lyons Ave., 13th St., and Circle J) in a two-mile stretch, train whistles will sound for an extended period of time every time a train passes through town at all hours of the day and night which will be a significant disturbance to broad swaths of the community.

Topic 12: Population and Housing

OVOV has proposed to induce substantial population growth both directly and indirectly, all of which will be using the at-grade Lyons Crossing. Directly, development of the property adjacent to the Lyons Crossing will increase dwelling units by 150% (plus the approved Compass Project), may add 500,000-700,000 square feet of commercial industrial space, may allow for a hotel/spa, will allow 40,000-50,000 square feet of new local retail, and add (a proposed) additional elementary school. Indirectly, the resulting growth will create a new traffic hub that will adversely affect a long-existing rural equestrian neighborhood, and will displace some of its existing homes and local businesses.

Topic 13: Public Services

The proposed Lyons Crossing would be a traffic hub which could impede response time for fire, sheriff, and other emergency vehicles. The resulting proposed new development would further increase demand and need for those services.

Topic 14: Recreation

Placerita Canyon is a rural equestrian area with a large active facility hosting frequent regional horse shows. A second equestrian facility is planned, increasing the amount of horse trailer traffic across the railroad crossing. Santa Clarita's trail system has many existing paths in Placerita Canyon and more planned. These accommodate hikers, bicyclists, and equestrians, all of whom would access the area by the at-grade railroad Crossing.

Topic 15: Transportation

A second rail line has been constructed in the area, confirming the demand for additional rail traffic. Additional train traffic can be expected from the proposed feeder lines for

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ExpressRail. The effect of the High Speed Rail Project on existing facilities is yet unknown but must be anticipated.

The Lyons Project analysis must fully account for proximity to the Newhall Metrolink Station. Every Metrolink train will bring traffic to a halt whether or not it stops at the station, and the frequency will be greater during peak hour vehicle traffic. When a train is stopped at the Newhall Metrolink Station, the arms will be down for an extended time.

Placerita Canyon Road is a private road located wildfire/fire hazard zone, and is gated on its eastern end. While the gate is supposed to be open during emergencies, that has not always been the case, requiring residents to cross over the railroad.

In summary, the Lyons Avenue Project DEIR has not met CEQA requirements. It has not properly evaluated the Dockweiler Project in conjunction with the Lyons Project. The Lyons Project creates its own safety hazards, and will create a traffic hub that connects other major streets, but that foreseeable impact has not been fully evaluated. The alternative crossing at 13th Street will never obtain PUC approval, and is also inadequate. The Market Street crossing is the only alternative which lessens but does not eliminate the major environmental burdens which adversely impact the rest of the community, and especially Placerita Canyon.

Yours very truly,


ARNOLD K. GRAHAM

cc: Client

AKG/fs
Enclosure

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May 26, 2010

Robert P. Silverstein, Esq.
The Silverstein Law Firm
215 North Marengo Avenue
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Pasadena, CA 91101

Subject: Lyons Avenue At-Grade Railroad Crossing
Santa Clarita, CA

Dear Mr. Silverstein:

I have reviewed the *Lyons Avenue At-Grade Railroad Crossing Stage 1 Draft EIR*, dated March 2010. I concentrated on the traffic and transportation issues, but I also reviewed the remainder of the text for background purposes. Following are my comments.

1. The document reports on the analysis of the first stage of a two-stage project that, in its second stage, entails the extension of an arterial street and the development of 213 acres of vacant land. As such, the analysis is incomplete, because the potentially significant impacts of the second stage of the project are ignored.

The Draft EIR (DEIR) is focused on the analyses of the impacts of the relocating the existing railroad crossing east of Railroad Avenue from its current location at 13th Street to new location as the extension of Lyons Avenue. However, one of the primary objectives of the relocation is to "Provide greater connectivity between Downtown Newhall, Placerita Canyon, The Master's College, and the residents that live along Dockweiler Drive." [page 7.0-2]

Fulfilling that "connectivity" objective will result in significant impacts on the North Newhall area by opening the area to the opportunity for substantial new development, on Dockweiler Drive because of increased traffic flow through the residential sections of the street, and on Lyons Avenue because of increased attraction as a route between the eastern and western parts of Santa Clarita and the two freeways that serve the city. The DEIR recognizes that by saying "... the two components of the project (CPUC approval [of the new railroad crossing], followed by Specific Plan and roadway [Dockweiler Drive] extension) are interdependent The crossing change cannot be done without the development of the NNSP [North Newhall Specific Plan] area." [page 2.0-3]

Yet, the effects of one part of the project upon the other and upon the greater environment must be postponed according to the DEIR. "The City will prepare the Stage

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II document upon receipt of a project application from deemed completed by the Community Development Department.” [page 2.0-3] That statement is made even though enough is known about the NNSP that it can be described in great detail as to the proposed uses – residential units, research and development, offices, community retail, and a hotel – and as to the exact numbers of units and the exact floor areas of the non-residential components. [page 5.6-5]

Certainly, that s enough detail that the specific impacts of that development and of the extension of Dockweiler Drive could be considered as part of a DEIR of the entire “interdependent” project. Postponing consideration of the difficult issues that will arise from the Stage II components may lead the reader to infer that the project proponent is avoiding addressing potentially significant problems for the developer of the NNSP. The fact that the probable developer of the NNSP is funding the preparation of the EIR can only strengthen the inference. [City Council action on May 26, 2009, authorizing the professional services agreement to prepare the EIR. “EIR preparation costs will be borne by the co-applicant, Casden Santa Clarita, LLC,” according the City Council Agenda Report. The City of Santa Clarita is the other co-applicant of the project.]

2. As currently configured, the Lyons Avenue railroad crossing will not connect to any existing street east of the railroad in “Stage I” of the project. Therefore, the crossing will not be functional until a street connection – purportedly the extension of Dockweiler Drive – is complete, and the analysis of the railroad crossing should not be separated from the analysis of the street extension, as they are “interdependent.”

State and federal agencies that are evaluating a road project apply the standard of “independent utility.” That is, they determine whether or not the reposed road improvement will function on its own without further construction of another road project.

As illustrated in several DEIR figures, the eastern extent of the Lyons Avenue railroad crossing project will be the western edge of Newhall Creek. [Figures 2.0-4, 5.5-5, and 5.6-1] The new crossing cannot function until it is connected to the rest of the street network. As currently proposed by the City, the extension of Dockweiler Drive is the connection. The “two components of the project... are interdependent. The crossing change cannot be done without the development of the NNSP area.” [page 2.0-3]

As stated in the DEIR, the existing 13th Street railroad crossing is not proposed to be closed to traffic until Dockweiler Drive has been extended to connect to the new Lyons Avenue railroad crossing. “Upon approval by the California Public Utilities Commission (CPUC) and the completion of the future extension of Dockweiler Drive as a part of the North Newhall Specific Plan (NNSP) Stage II EIR, the existing 13th Street at-grade rail crossing would be abandoned.” [page 3.0-4] Also, “Upon completion of the future Dockweiler Drive extension and the at-grade rail crossing at Lyons Avenue, the existing 13th Street at-grade rail crossing would be closed.” [page 5.6-22]

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The Southern California Regional Rail Authority (SCRRA), a five-county joint powers authority created by the CPUC, has passed Resolution 98-21, which requires that a member agency that is requesting a new highway-railroad crossing also request the closure of an existing highway-railroad crossing, "so there will be no net increase in the number of highway-railroad crossings on SCRRA's commuter rail system." [page 5.6-17] Therefore, the Lyons Avenue crossing could not be opened until the 13th Street crossing can be closed. In the meanwhile, the Lyons Avenue crossing will have to be made unusable by the installation of barricades or similar methods to block traffic flow.

There is no substantive explanation of why the proponents of the project are in a hurry to produce the DEIR for the Lyons Avenue railroad crossing when its functionality is entirely dependent on the connection to Dockweiler Drive, and the EIR process for the extension of that street has not yet begun. When will the street extension be constructed, so the new crossing could be opened to traffic?

3. There is no indication in the DEIR that the extension of Dockweiler Drive will be feasible despite several severe physical impediments and substantial impacts on the environment along the existing street.

Currently, Dockweiler Drive extends from a tee-intersection with Sierra Highway, near the southeastern limits of the City of Santa Clarita, to a short distance west of Leonard Tree Lane, a total length of approximately 9/10ths of a mile. Beyond the end of the paved roadway west of Leonard Tree Lane, the extension of Dockweiler Drive is an unpaved, narrow dirt track, less than two lanes wide, along a narrow piece of land that juts out toward the west from the existing residential neighborhood.

On either side of the dirt road and at its western end, there are steep embankments to the valleys below. Both the side embankments and the valley to the west appear to be several hundred feet in height. The area on top of the land that is currently occupied by the narrow dirt road is not wide enough to accommodate the proposed street extension. Therefore, there will have to be substantial importing of earth and, perhaps, construction of large retaining walls to fill in the existing side embankments and provide an adequate "platform" upon which to build the new street. Extending the road toward the west across the valley may require further earth fill and retaining walls, or, perhaps, an expensive bridge with no connections to the land and developments on either side. Alternatively, Dockweiler Drive could be extended downward into the valley by way of relatively steep roadway grades and side slopes.

Either method of extending the street will require substantial earth-moving that may make it impracticable to build the extension.

"According to the Santa Clarita General Plan, Dockweiler Drive is designated as a secondary highway." [page 2.0-19] "The approved Master's College Master Plan amended the Circulation Element to define and re-designate Dockweiler Drive as a four lane secondary highway." [page 10.0-2]

Currently, "Dockweiler Drive consists of one lane in each direction with a landscaped median and is used as the primary access to single-family and multiple-family

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residences along Dockweiler Drive." [page 2.0-19] Essentially, the existing street is acting as a Local Residential Street with parking permitted at all times at both curbs. The parking is used extensively throughout the day. The two roadways (including the parking) are each 25 feet wide, and the landscaped median that separates the roadways is 13 to 14 feet wide.

Connecting that residential neighborhood street to a secondary highway will change the character of the street and the residential neighborhood that it serves. The proposed Dockweiler Drive-Lyons Avenue-Pico Canyon Road artery will provide a continuous east-west through route from substantially west of the Golden State Freeway (I-5) to the Antelope Valley Freeway (SR-14), an uninterrupted length of more than five miles. Obviously, such a route connecting several of the City of Santa Clarita's communities and the two freeways will attract substantial volumes of through traffic.

The existing section of Dockweiler Drive functions as a residential neighborhood street now, because the only development it serves is residential, and there can be no through traffic from other communities, because the street ends at Leonard Tree Lane. Residents who are used to a relatively peaceful street environment will experience increased noise, vibrations, and potential safety hazards resulting from the intrusion of through traffic when Dockweiler Drive is connected to Lyons Avenue.

There is no assurance that the existing street section, with only one traffic lane in each direction, will accommodate the substantial increases in traffic flows throughout the day, and particularly during the peak commuter periods. There may come a time when it will become necessary to eliminate the on-street parking on Dockweiler Drive in order to provide a C-second lane in each direction to match the four-lane divided configuration of the proposed secondary highway that will be built as the street extension toward the west to connect to Lyons Avenue. That elimination of curbside parking will cause a hardship to the residents along the existing section of the street who are used to the availability of on-street parking along Dockweiler Drive through their neighborhood, particularly those who have garages that will accommodate cars but not trucks.

Is the City contemplating widening the existing segment of Dockweiler Drive to provide two lanes in each direction while retaining the parking? Adequate widening would essentially eliminate the landscaping, including mature trees, in front of many of the residences that line the street. Will sidewalks be provided along existing Dockweiler Drive to accommodate the school children and other pedestrians where there are no sidewalks now? Considering the increases in traffic volumes and vehicle speeds that will accompany the continuity of the street, the pedestrian safety issues must be addressed before connection can be approved.

The City has recognized the potential for through traffic problems on Dockweiler Drive after its extension to Lyons Avenue. "[T]he City plans to incorporate traffic calming measures on Dockweiler Drive to limit cut-through traffic to and from Sierra Highway to maintain the residential character of the existing Dockweiler Drive." [page 5.6-6] This is an admission that the proposed connection of the two streets is a flawed

plan that will immediately lead to significant impacts on the environment in the existing residential neighborhood.

In traffic engineering, it is not typical practice to apply traffic calming measures to any arterial street, such as the secondary highway. For any arterial street, the primary purpose is the safe and efficient movement of traffic. The installation of traffic calming devices, with the sole purpose of slowing and making the street unattractive to through traffic flow, is at cross purposes with the secondary highway designation. Either the street will be a secondary highway accommodating substantial traffic flows or it will remain a residential neighborhood street providing access and parking for the homes adjacent to the street and a safe, attractive environment for the residents. The street cannot perform both functions effectively.

If Dockweiler Drive is not to become a through traffic route, why not build the new section of the street to be discontinuous from the existing residential section? That is, start the new section in the valley near The Master's College and west of the neighborhood, and then extend it westward to the Lyons Avenue railroad crossing. That new section would serve the college traffic and provide connectivity to downtown Newhall for the NNSP development, which is one of the goals of the crossing project, while protecting the existing residential neighborhood.

A discontinuity between existing Dockweiler Drive and the proposed secondary highway extension would have several advantages: 1) it would protect the existing residential neighborhood from through traffic; 2) it could be built without the substantial earth-moving costs and environmental impacts that will result from a connection to the existing Dockweiler Drive; and 3) the extension could be named Lyons Avenue to remove driver confusion that would result from a change of street names for the new section east of the railroad.

There would be one disadvantage to the street discontinuity: drivers traveling from and to the NNSP development and other nearby developments could not use the extension as an access route to/from Sierra Highway and the Antelope Freeway. That would be a large component of the undesirable through traffic in the residential neighborhood that would not materialize if the discontinuous design is implemented.

4. One of the stated primary objectives of the Lyons Avenue railroad crossing is the improvement of traffic safety. But, the 13th Street crossing has been relatively safe, and its safety could be further enhanced with modernized traffic control devices.

Every traffic accident is regrettable, especially those that could have been prevented by a better physical condition or better application and operation of traffic control devices.

"A review of the United States Department of Transportation (U. S. DOT) - Federal Railroad Administration traffic report indicates a total of four train-auto accidents have been recorded at the 13th Street at-grade rail crossing since December 1977,

including 1 fatality." [page 5.6-9] The DEIR includes the actual accident reports for each of the four accidents as part of the appendix to the Overland Traffic Consultants, Inc. report, which itself is an appendix to the DEIR. Following are data for the four accidents.

<u>Date & Time of Accident</u>	<u>Highway Vehicle Driver Action</u>	<u>Number of People Killed</u>	<u>Number of People Injured</u>
12/03/1977; 5:35 p.m.	Stalled on crossing	0	0
12/06/1990; 10:00 a.m.	Stopped on crossing	0	0
01/16/1999; 3:30 p.m.	"Drove through gates"	1 (83-year-old driver)	0
07/23/1999; 2:32 p.m.	Stalled on Crossing	0	0

After the first accident in 1977, it was 13 years until the next accident in 1990. Then, it was more than eight years until the next two accidents, both in 1999. Since the fourth accident (July 1999), there have been more than ten years with no railroad crossing accidents at 13th Street. That current record is better than the experience cited in the DEIR as exemplary for "the crossing at Ruether Avenue where only one accident has been reported in more than 10 years of operation." [page 5.6-29]

In three of the four accidents, there was no one killed or injured in either the highway vehicle or on the train. In the one fatal accident, there was probably driver error, as the vehicle was driven through or around the crossing gates that were operating properly.

Those four accidents over a 32-year period are not sufficient to warrant the relocation of the 13th Street railroad crossing to Lyons Avenue for safety considerations. All four accidents could have been prevented by the installation of better traffic control devices, that is, the same devices that are being proposed in the DEIR for the relocated crossing and are described as "Sealed corridor safety enhancements". [page 5.6-29] The proposed measures for the Lyons Avenue crossing include "four-quadrant gates to eliminate all travel across the tracks when the signals are activated, ... raised central medians, ...and video cameras to monitor operation of the at-grade rail crossing..." [pages 5.6-29, 30] If those or similar measures had been installed at the 13th Street crossing, all four accidents, especially the fatality, would likely have been prevented.

It would be interesting and useful to the public and the decision makers to have a comparison between the experience of four railroad-highway vehicle accidents in 32 years (1977 through 2009) at the existing 13th Street railroad crossing versus the highway vehicle accident history at the nearby Lyons Avenue/Railroad Avenue intersection during the same 32 years. Although we do not have the accident history for the street intersection, the City staff has access to it, and they should be requested to provide the street intersection accident history for comparison purposes.

5. The DEJR conclusion that the proposed railroad crossing relocation project will not be "growth inducing" is contradicted by other statements in the DEIR.

According to the DEIR, "Generally, a project may foster spatial, economic, or population growth in a geographic area if it meets anyone of four criteria that are identified below:

- Removal of an impediment to growth (...the provision of new access to an area)..." [page 10.0-1]

Also in the DEIR, "Growth in an area may result from the removal of physical impediments or restrictions to growth. In this context, physical growth impediments may include non-existent or inadequate access to an area or the lack of essential services." [page 10.0-2]

The DEIR discussion in Section 10 continues by describing several amendments to the General Plan Circulation Element that called for the extension of Dockweiler Drive, as a four-lane secondary highway, and its connection to Lyons Avenue. The objective of that street project would be "...to allow for traffic flow from Sierra Highway to Interstate (I) 5 Freeway." [page 10.0-2]

Then, the DEIR authors come to the following conclusion: "This project [relocation of the railroad crossing is not growth inducing as the proposed project would facilitate circulation within an infill area of the City and does not encourage growth into the area. As such, the proposed project would not be considered growth inducing." [page 10.0-2] That conclusion seems to be based on the theory that a street that is shown in the Circulation Element, although not actually built, can be considered as if it actually exists and is usable by traffic.

The conclusion is completely contradicted by a statement in the "Alternatives" section of the DEIR. In describing "Alternative 1 - No Project Alternative", the DEIR states, "The Stage II North Newhall Specific Plan (NNSP) would not occur" if the railroad crossing relocation does not take place. [page 7.0-10] The NNSP is the planned development of "809 dwelling units plus a commercial land use component of approximately 176,500 square feet (sf) of research and development uses, 186,500 sf of office uses, 40,000 sf of community retail, and a hotel of 70,000 sf." [page 5.6-5] Therefore, a substantial and, perhaps, the primary purpose of the railroad crossing relocation (Stage I) project is to facilitate the development planned for the NNSP (the Stage II project).

Contrary to the DEIR conclusion, it should be concluded that any street improvement project that will make it feasible to build such an extensive development should be considered growth inducing, and the relocation of the railroad crossing meets that definition.

6. The stoppage of trains at the nearby Metrolink station may impact traffic flow at the proposed Lyons Avenue railroad crossing.

"The nearest rail station to the proposed project is located at Railroad Avenue and Market Street approximately 0.2 mile south of the Lyons Avenue and Railroad Avenue

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intersection (project site)." [page 3.0-7] The station is approximately 1,000 feet south of the proposed railroad crossing. Will trains stopped at the station result in the crossing gates and flashers remaining activated for the duration of the stop? If so, the crossing would not be usable for highway vehicle traffic during those stops, which will be most significant during the morning and afternoon commuter traffic and commuter train peak periods. If it can be documented, with technical information about the operation of the crossing gates and signals, that there will be no interference with Lyons Avenue traffic flow as a result of stopped trains and the operation of the crossing protection devices, that should be presented clearly in the DEIR. In either case, the concern that has been expressed by many Santa Clarita residents should be specifically addressed in the DEIR.

7. The analysis of the construction impacts of the project does not address the most important issue - the detouring of traffic from Railroad Avenue and Lyons Avenue while both streets are being elevated and widened.

The railroad track east of the Lyons Avenue/Railroad Avenue intersection is approximately 4 to 5 feet higher than the existing surface of the street intersection. To achieve an at-grade crossing of the railroad, substantial sections of both streets will have to be elevated - Lyons Avenue from Main Street to Railroad Avenue, and Railroad Avenue from approximately 9th Street to north of 11th Street. In conjunction with the elevation of the two streets, both streets will be widened, and new sidewalks, retaining walls, and improvements to the adjacent properties will have to be built.

During the time that the two streets are being re-constructed, traffic that currently uses those streets will have to be detoured to other streets. For example, Lyons Avenue traffic heading to the existing 13th Street railroad crossing may be forced to use Walnut Street and 12th Street to bypass the construction area. North-south traffic currently using Railroad Avenue may have to use Main Street, Walnut Street, or Newhall Avenue.

The DEIR does not address the significant issue of traffic that will have to be detoured during the substantial street re-construction period. [page 5.6-22] The only construction-related issues addressed are the movements of large construction equipment and the commuting of construction workers, both of which are significant issues, but will be far less disrupting than the closure of two arterial streets to all traffic during the re-construction of both streets.

The construction-related questions that should be addressed by the DEIR include the following. 1) Will the streets that are available for detour routing have the capacities to carry the substantial volumes of additional traffic? 2) What will be the impacts on developments, particularly downtown businesses, adjacent to those streets? 3) How far from the construction area will drivers route themselves to the detour streets in order to minimize congestion and delay near the construction area? 4) What will be the impact of construction detouring and related congestion on access to and use of the Metrolink station that is located only two blocks south of the beginning of the Railroad Avenue re-construction section?

8. The requirements of the construction plan mitigation measure are confusing and contradictory.

Mitigation Measure MM 5.6-1 begins with the requirement that "The applicant shall develop and implement a construction traffic control plan (CTCP) prior to the start of construction." [page 5.6-26] Some of the conditions for the plan are as follows:

- "The CTCP shall be submitted to, and approved by, the City Engineer." [emphasis added]
- "In areas where traffic control necessitates, the contractor shall provide, post and maintain 'No Parking' and 'No Stopping' signs, as directed by the Director of Public Works." [emphasis added]
- "The locations of all signs shall be determined in the field by the County Engineer in conjunction with the contractor." [emphasis added]

Are those requirements meant to apply to three different people? Or, are the City Engineer and the Director of Public Works the same person? And, why is the County Engineer involved in performing a single task during a construction project that is entirely within the City of Santa Clarita?

In summary, my recommendation is that further study be given to the feasibility of connecting Lyons Avenue to Dockweiler Drive and to the practical problems and environmental impacts that will result. As part of that study, there should be serious consideration of my recommendation to extend Lyons Avenue to the vicinity of the Master's College but not connect it to the existing residential section of Dockweiler Drive, as discussed on pages 4 and 5 of this letter.

Then, after an agreeable program has been set forth, a single DEIR should be prepared to analyze the impacts of the relocation of the railroad crossing, the extension of the arterial street, and the extensive development proposed for the NNSP area, particularly the Casden project and the Compass Blueprint Project. At that time, sufficient duration should be provided for the public to review the complex, multi-faceted project that is the total of all of the issues that should be considered as an "interdependent" project.

I would be pleased to discuss my comments with you, with members of the public, and with the staff and officials of the City of Santa Clarita.

Very truly yours,

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Registered Civil Engineer No. C 15563
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