

LAW OFFICES

**GRAHAM • VAAGE LLP**

8<sup>th</sup> Floor  
155 NORTH LAKE AVENUE

PASADENA, CALIFORNIA 91101

TELEPHONE  
(818) 547-4800

FACSIMILE  
(818) 547-3100

PLEASE REPLY TO:  
Arnold K. Graham

FILE NO:  
PCPOA

**VIA E-MAIL, FACSIMILE, AND  
FIRST CLASS U.S. MAIL**

February 18, 2018

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

Re: *Objections by Placerita Canyon Property Owners' Association to the City of Santa Clarita's Proposed Lyons Avenue / Dockweiler Drive Extension Project*

Dear Mayor Weste and Santa Clarita City Council Members:

This office represents the interests of the Placerita Canyon Property Owners' Association ("PCPOA") and its members in regard to their opposition to the above-referenced proposed "Lyons Avenue/Dockweiler Drive Extension Project" / "Dockweiler Drive to the Master's University Project," and to all alternatives considered by the City in its Draft FEIR ("FEIR") (the "Project"), except for the City's No Project Alternative, and including the Project's risks and challenges to Southern California Regional Rail Authority's ("SCRRA") Metrolink's operations and rail system, as well as the dangers and adverse impacts the Project poses to the public safety, welfare, and well-being.

Through these additional and its previous October 2017 Objections, PCPOA objects to the City's August 2017 DEIR, February 2018 FEIR, and the proposed Project, inclusive of Alternative Nos. 1 and 2, on a number of bases. PCPOA hereby incorporates by reference all objections previously submitted by PCPOA to the Santa Clarita Mayor and members of the City Council in October 2017, and the May 26, 2010 Review of the Lyons At-Grade Railroad Crossing Stage 1 Draft EIR ("DEIR") conducted by Consulting Traffic Engineer Arthur L. Kassan, P.E. (attached hereto), and further elaborates upon certain objections, and responds to certain of the City's Responses to the PCPOA's October 2017 Objections.<sup>1</sup>

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<sup>1</sup> With regard to the City's Responses to the PCPOA's Comments in its February 2018 DEIR, PCPOA objects to the City's disregard of PCPOA's October 2017 objections to the extent that the objections referenced the Lyons Avenue At-Grade Rail Crossing Project as a separate project. PCPOA's objections to the Lyons Avenue At-Grade Rail Crossing Project as a stand-alone project apply equally to PCPOA's position regarding the Lyons Avenue grade crossing portion of the proposed Lyons Avenue/Dockweiler Drive Extension Project. PCPOA incorporates the Kassan Study where applicable to the Lyons Avenue grade crossing portion of the proposed Project discussed in the City's August 2017 DEIR and February

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In sum, PCPOA objects to the proposed Project and its Alternative Nos. 1 and 2 in their current form, as the City's DEIR and FEIR do not comply with the California Environmental Quality Act (CEQA), including Public Resources Code §21081.6; CEQA Guidelines, including §§15121, 15151, 15126.6, 15362, and 15097; and the Santa Clarita Municipal Code, including §17.39.020. As such, PCPOA objects to any action by the City Council certifying the City's FEIR under CEQA Guidelines §15367 at its meeting scheduled for February 27, 2018, or any time thereafter.

As stated in the Project's FEIR, the proposed Project includes two primary components: "Dockweiler Drive to the Master's University Project," and the "Lyons Avenue/Dockweiler Drive Extension Project." Through the Dockweiler Drive Alignment component of the Project, the City is proposing to extend Dockweiler Drive to Lyons Avenue and Arch Street, directly through the heart and in violation of the Placerita Canyon Special Standards District (PCSSD), essentially connecting Sierra Highway to the commercial center of Santa Clarita and the I-5 Freeway by turning Dockweiler Drive into a major bypass to divert and redirect several tens of thousands of cars daily from the 14 Freeway, most of which would then cross the proposed at-grade rail crossing at Lyons Avenue. The Project's purported Environmentally Superior Alternative (Alternative No. 2) likewise involves the extension of Dockweiler Drive to Arch Street, in violation of the PCSSD, regardless that it does not involve the creation of a new at-grade rail crossing at Lyons Avenue.

The other major component of the proposed Project involves the construction of a new at-grade Metrolink/Union Pacific Railroad ("UPRR") crossing at the intersection of Lyons Avenue and Railroad Avenue, and the closure of one other at-grade crossing located north at the intersection of 13<sup>th</sup> Street and Railroad Avenue. The existing UPRR/Metrolink rail line extends through the City of Santa Clarita, and is shared by at least 38 freight (UPRR) and passenger (Metrolink Antelope Valley line) trains on a daily basis, 24 hours a day, 7 days per week. The nearest Metrolink train station to the Project location is the Jan Heidt Newhall station located at the intersection of Railroad Avenue and Market Street, approximately 0.25 miles south of Lyons Avenue, which station provides passenger service southbound to Los Angeles and northbound to Lancaster, along with vehicular connections to the City's local bus lines 1, 2, 4, 6, 14, and 757.<sup>2</sup> The Metrolink/UPRR tracks restrict vehicular access to the west with there being three existing at-grade crossings within a 2-mile stretch from Lyons Avenue, located at 13<sup>th</sup> Street, Market Street, and Newhall Avenue.<sup>3</sup>

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2018 FEIR.

<sup>2</sup> DEIR (August 2017), Section 2.1

<sup>3</sup> DEIR (August 2017), Section 3-8

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In its proposed FEIR, in response to PCPOA's contentions that approval of the proposed Project, including Alternative Nos. 1 and 2, would be in derogation of the PCSSD, the City continuously refers to its purported "detailed analysis evaluating the consistency of the Proposed Project to the specific applicable development standards for the PCSSD area," contained in Section 4.7, Table 4.7-3, page 4.7-18 of its DEIR.<sup>4</sup> The City's analysis purports to discuss three of the development standards required by the PCSSD related to the placement and quantity of street lights, quantity of bridges, and the effects of proposed drainage systems, and contends that the proposed Project will comply with all these requirements. The City further attempts to bootstrap its justification of the Dockweiler Drive extension by referring to the City's previously-adopted General Plan which generally references the proposed connection and extension of Lyons Avenue to Dockweiler Drive in the Plan's Circulation Element as one of the primary east-west arterials through Santa Clarita.

The City's analysis is insufficient and inadequate, as it completely ignores the effects of the proposed Project and its Alternative Nos. 1 and 2 on the overriding purpose of the PCSSD to "protect, maintain, preserve and enhance the secluded, rural equestrian character of the community." SMC §17.39.020(A). Rather, as discussed extensively in the PCPOA's October 2017 Objections, the transformation of Dockweiler Drive into a major vehicular bypass will fundamentally alter Placerita Canyon by promoting the conditions allowing substantively heavier traffic, light, noise, and air pollution, visual blight, and new residential and commercial development within the PCSSD, which is by definition a rural, equestrian community with a large, activity facility hosting frequent regional horse shows, and a trail system with many existing paths in Placerita Canyon and more planned to accommodate hikers, bikers, and equestrians.<sup>5</sup>

The City arrogantly admits in its DEIR and FEIR<sup>6</sup> that the road expansion and extension will cause many of these severely adverse problems, and proffers purported mitigation measures

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<sup>4</sup> See, City's Responses to PCPOA Comment Nos. 12.3, 12.4, 12.5, 12.14, 12.27.

<sup>5</sup> See, PCPOA's October 2017 Objections, Topics 1, 2, 3, 7, 11, 12, 14, and 15.

<sup>6</sup> See, e.g., City's Responses to PCPOA Comment No. 12.13: "With respect to light, as disclosed in the DEIR, the Project would be expected to slightly increase ambient lighting in the area..."; see also, e.g. City's Response to PCPOA Comment No. 12.15, whereby the City only addresses the effects of the proposed Project on regional air quality; see also, e.g., City's Response to PCPOA Comment No. 12.23 regarding hazardous materials.

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to alleviate the proposed Project's damages and adverse conditions. However, the City's mitigation measures are not adequate or satisfactory under CEQA Guidelines §§15121 and 15362. With regard to aesthetics and air pollution, the City attempts to minimize the effects and thereby justify the proposed Project by stating that the Project does not propose any new buildings or development.<sup>7</sup> The City's Responses disregard the clearly foreseeable effects of the Project which will indelibly imprint the Placerita Canyon community with the brand of a major thoroughfare, with the inevitable new buildings and development which will follow, along with the consequences of a fundamental change which would result from the major increase in traffic volume and conditions in the PCSSD. Further, that the City proposes to mitigate a major environmental defect by use of cosmetics to "attractively landscape" the proposed roadway median and contoured slopes along the roadway alignment which is the proverbial "lipstick on a pig," and does nothing to change the fact that the existing, rural landscape and character of Placerita Canyon will be permanently and irreparably destroyed by the proposed Project or its Alternative Nos. 1 and 2.

With regard to lighting, it does not matter that the City will comply with "the design standards and requirements established in the Santa Clarita Municipal Code," as the effects of the headlights of thousands of cars and new street lights will inevitably result in significant, detrimental lighting impacts to the community. Likewise, thousands of passing vehicles will cause increased noise and carcinogens from the pollution resulting from the fumes, exhaust, dust, and tire rubber residue from hundreds of thousands of additional vehicles annually, and the corresponding risks of increased vehicle accidents and hazardous spills within the PCSSD, which facts the City does not directly deny (see Footnote 6). The attached photo of a truck hauling earth moving equipment waiting to cross the railroad crossing at 13<sup>th</sup> Street while emitting vast quantities of diesel exhaust, demonstrates not only the type of traffic jams that consistently occur throughout any given day, but also the type of noise and air pollution to which the Placerita Canyon Community will be subjected daily if the City approves the Project or its Alternatives 1 or 2.

Further is the essential missing fact that the City does not assess the extent to which each of these detriments will create a reactionary loop, and how the cumulatively *overall* effects of the proposed Project and its Alternatives 1 and 2 will eviscerate the intended purpose of the PCSSD. As new development will attract into this pastoral Canyon community larger numbers of people, traffic, pollution, the potentiality of vehicle collisions and spills of hazardous materials will increase. As discussed below, the addition of a new at-grade rail crossing will only exacerbate these problems as thousands of vehicles daily are halted within the PCSSD by passing trains. The City's DEIR and FEIR both fail to adequately take into consideration the extent to which the combination of these elements will eviscerate the intended purpose of the PCSSD to the extreme

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<sup>7</sup> See, City's Responses to PCPOA Comment Nos. 12.13, 12.15, and 12.30.

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detriment of its residents.

Additionally, if not responsibly evaluated to correctly identify and measure its negative impacts overall, the City's proposed Project will likewise create several constraints and challenges specifically to SCRRA and its operation of Metrolink, as well as related risk and dangers to the public safety, welfare, and well-being, none of which are even close to being adequately considered in the City's August 2017 DEIR or February 2018 FEIR, in violation of CEQA Guidelines §15367.

For one, the increased vehicular traffic from the Project would increase the risks of accidents at the new railroad crossing at Lyons Avenue. As stated in the SCRRA's Comment Letter to the City's Notice of Preparation of the DEIR for the Project dated September 4, 2013 (attached), the SCRRA Board has adopted a policy that all new commuter rail line crossings be grade separated to eliminate the potential for future at-grade crossing accidents with vehicles and/or pedestrians. At-grade crossing options may be considered only in the event that drastic risk reduction measures are implemented that would include closing two or more crossings in the vicinity and making other safety enhancements to the remaining crossings that would handle the additional traffic flows across the rail tracks. In violation of the SCRRA's policies, and at the expense of public safety, the proposed Project only calls for the closure of a single railroad grade crossing (13<sup>th</sup> Street and Railroad Avenue), and does not propose other adequate risk reduction measures or safety enhancements to the proposed grade crossing.

The Project must also account for the effects of increased traffic within the Placerita Canyon community by the addition of an at-grade crossing along a new, major corridor of Dockweiler Drive. As discussed, the Dockweiler Drive extension through the Placerita Canyon community, which will effectively connect Sierra Highway, the commercial center of Santa Clarita, and the I-5 Freeway, will drastically increase the amount of commercial and residential development to the east, and vehicles travelling across the UPRR/Metrolink train tracks. Every Metrolink train will bring this traffic to a halt whether or not the train stops at the Newhall Station, and the frequency will be even greater during peak hour vehicle traffic (i.e., during morning and afternoon commuter traffic). The additional volume of traffic which would result from the Project would increase the risk for transportation-related accidents, and the increased risk of transportation-related accidents would correspondingly then create even additional adverse vehicle traffic conditions. The cumulative resulting vehicle traffic, in addition to the fact that federal railroad regulations require that train horns be sounded each time a train approaches each at-grade rail crossing located in the Project's vicinity (see SCRRA September 2013 letter), will generate substantial noise and air pollution, interfering with the abilities of those who reside in the area to

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use and enjoy the sanctity of their residential rural community and properties.<sup>8</sup>

The dangers of the Lyons Avenue grade crossing portion of the Project are further emphasized in a comment letter submitted by Chi Cheung To, a Utilities Engineer for the California Public Utilities Commission (CPUC), to the City on September 5, 2017. In his letter, Mr. To emphasizes that the CPUC opposes the grade crossing portion of the Project because: accident history reveals grade crossings located adjacent to a parallel highway and four-legged intersections are prone to accidents; Lyons Avenue will be utilized as a major arterial between Interstate 5 Freeway and State Route 14, and therefore, traffic volume and roadway function are not comparable to the existing 13<sup>th</sup> Street Crossing; and the grade separation options have not adequately been demonstrated as impracticable. In its responses to said comment letter, the City again fails to adequately demonstrate that the grade crossing would not have a significant impact on the safety and well-being of the residents of Placerita Canyon and the public.

Further, the proposed Lyons Avenue railroad grade crossing Project presents significant engineering conditions and related economic obstacles. As stated in the attached previous PCPOA objections, the Lyons Crossing will expose the railroad tracks and its fill to excess saturation, erosion, and flood damage, as the constriction of the watercourse under high water-flow conditions resulting from the proposed Lyons Crossing would raise the flood waters to a level which could overtop the elevation of the railroad.<sup>9</sup> These foreseeable conditions do not have a studied engineering solution or one that is economically viable.

In sum, the City's proposed Project and each of its Alternative Nos. 1 and 2, as stated in its August 2017 DEIR and February 2018 FEIR, will violate the stated purpose of the PCSSD. The City has not properly or adequately considered the combined environmental effects of all of the Project's elements on the PCSSD or the public at large, and therefore violates CEQA, as well as

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<sup>8</sup> Per the City's June 2011 General Plan, the design and construction of the proposed at-grade Lyons Avenue crossing will include the lowering of some of the ridgelines in the Project's vicinity, which would allow more noise from trains and traffic to penetrate the entire area.

<sup>9</sup> Mike Hennaway of the City of Santa Clarita stated in a December 14, 2009 email to Craig Kwasviewski, 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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the Santa Clarita Municipal Code. Further, the proposed Project will pose significant risks and challenges to the SCRRRA's operations of Metrolink, as well as dangers to the public safety and well-being, none of which have been adequately considered.

PCPOA therefore objects to the proposed Project, including Alternative Nos. 1 and 2, and urges the City Council to reject it in its current form, or to accept the City's No Project Alternative.

Yours very truly,

**ARNOLD K. GRAHAM**

cc: Arocles Aguilar, General Counsel, California Public Utilities Commission (by First Class U.S. Mail)

Santa Clarita City Attorney (by email)

Chi Cheung To, P.E. Utilities Engineer  
Rail Crossing and Engineering Branch, Safety and Enforcement Division  
320 West 4<sup>th</sup> Street, Suite 500  
Los Angeles, CA 90013  
(By First Class U.S. Mail)

Client (by email)

AKG/fs  
Enclosures