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May 10, 2022

VIA U. S. MAIL; PERSONAL DELIVERY; EMAIL

Mr. James Chow
Ms. Erica Iverson
City of Santa Clarita
23920 Valencia Blvd.
Valencia, CA 91355

RE: Notice of Preparation of Draft Environmental Impact Report and Initial Study for
the Proposed Blackball Studios Project.

MASTER CASE NO.: 21-109

Dear Mr. Chow and Ms. Iverson:

As you know, this office represents the Placerita Canyon Property Owners Association
("PCPOA").

Let me begin by thanking you for your courtesy and cooperation in agreeing to accept
these comments on the Notice of Preparation after the stated comment period.

Upon review of the Initial Study, PCPOA has these initial comments.

PLACERITA CANYON SPECIAL STANDARDS DISTRICT

While the Initial Study correctly states that the Project Site is "Located in the Newhall
community within the City of Santa Clarita," it fails to also acknowledge that the Project
Site lies within the boundaries for the Placerita Canyon Special Standards District.
(Please see **EXHIBIT 1**, which is a computer printout from the website for the City of
Santa Clarita, identifying the boundaries of the Placerita Canyon Special Standards
District.)

Adopted in June 2013, Santa Clarita Municipal Code section 17.39.020 states, "The
purpose of the Placerita Canyon special standards district (PCSSD) is to protect,
maintain, preserve and enhance the secluded, rural equestrian character of the
community, to enhance the community's unique appeal and to help mitigate the
cumulative impacts of residential development. Additionally, it is the purpose of these
special standards to ensure that new and expanded structures are compatible with the

characteristics of surrounding single-family residential neighborhoods, and protect the light, air, and privacy of existing single-family residences from negative impacts. These standards are also intended to ensure reasonable access to public riding and hiking trails, and to minimize the need for installation of infrastructure such as sewers, street lights, concrete sidewalks and concrete flood control systems that would alter the community's character, while providing for adequate drainage and other community safety features."

Relevant portions of the PCSSD provides the following "requirements" for Property Development Standards for any development in the District.

Any new development shall adhere to the following standards or provide the following amenities:

- a. Trails.
 - i. Riding and hiking trails shall be provided as depicted on the latest Placerita Canyon Backbone Trails exhibit on file with Parks, Recreation and Community Services, to the satisfaction of the Director of Parks, Recreation and Community Services;
 - ii. Trails shall be fenced to the satisfaction of the Director of Parks, Recreation and Community Services, with fences of a rustic wood appearance;
 - iii. Trail access shall be provided at all river crossings;
 - iv. There shall be no obstructions including, but not limited to, landscaping, trash receptacles, or other similar structures within a designated trail;
 - v. Fencing shall not be permitted to cross riverbeds in such a manner as to deny trail access;
 - vi. All new residential projects of greater than four (4) dwelling units and all new commercial, industrial and institutional projects (including expansion thereof) shall provide trail easements, consistent with community goals and the Placerita Canyon backbone trails exhibit, to the satisfaction of the Director of Parks, Recreation and Community Services;
 - vii. Unobstructed multipurpose pathways for both pedestrian and equestrian uses shall be developed in each new development to the

satisfaction of both the Director of Public Works and the Director of Parks, Recreation, and Community Services. Although alignments that are not adjacent to roadways will generally be preferred, road easements may be used when the Department of Parks, Recreation and Community Services determines that other locations are inappropriate; and

viii. Trail construction shall be completed and maintained in accordance with the conditions set forth by the Department of Parks, Recreation, and Community Services. All information pertaining to trail requirements shall be shown on the tentative parcel or tract map and on the final parcel or tract map prior to the final map recordation;

b. A property maintenance or homeowner maintenance association shall be established to maintain the private access route, private roads and drives, trail easements and other specific project amenities in all new residential projects of greater than four (4) dwelling units and all new commercial, industrial and institutional projects;

c. Street lights, in accordance with City standards, shall be installed only at road-to-road intersections; exterior lighting shall be designed to minimize off-site illumination, within the requirements for public safety. Exterior lighting on residential parcels shall be of top-shielded design to prevent direct off-site illumination; hoods shall be used to direct light away from adjacent parcels. Exterior lighting on nonresidential parcels shall be prohibited except where necessary for the safety of pedestrian and vehicular traffic, as determined by the City. To minimize off-site illumination where lights are required, cut-off fixtures in keeping with a rural equestrian architectural style will be specified;

d. River bottoms and sides shall not be improved with concrete. Fencing shall not be permitted to cross riverbeds in such a manner as to deny trail access;

e. Bridges shall be limited to those required for public safety and shall be designed to accommodate equestrian access;

g. Existing and future drainage shall be accommodated to provide adequate carrying capacity and erosion protection and shall not create or extend detrimental hazards or consequences upstream.

D. Commercial/Industrial Zones.

3. Noise Limits. Any loud music (live or recorded) shall comply with the noise limits as set forth in Section 11.44.040 (Noise Limits).

E. North Newhall Area. The following requirements shall apply to those properties in the Placerita Canyon special standards district that are within the North Newhall Area (NNA), as identified in the General Plan. The future uses and development within this area require careful advance planning and consideration of any potential projects shall be required to address each of the following subject areas:

2. Traffic Intrusion/Gateways.

- a. Be internally and externally pedestrian-oriented, and have equestrian and bicycle amenities and accommodations;
- b. Understand and acknowledge that any development at these locations will increase existing vehicular traffic and create new vehicular traffic, and that there will be impacts to equestrian and pedestrian circulation in the existing neighborhood, and therefore to minimize those impacts, special attention must be given to mitigate impacts caused by such identified access points;
- c. Layout and orientation of any developments shall be designed to discourage and where possible prevent additional trips into Placerita Canyon caused by or resulting from such developments;
- d. Include defined entry gateways or monuments into the Placerita Canyon special standards district, at Railroad Avenue, complete with landscaping and architectural elements with signage expressly stating there is no through traffic allowed; and
- e. A traffic study shall be prepared for all new developments that are projected to generate two hundred fifty (250) or more new daily trips, within the areas encompassed by the NNA. The traffic study shall analyze those potentially impacted intersections within the NNA area and those that lie within a one (1) mile radius of the subject development site.

3. Buffering and Transitions.

- a. Preserve the existing rural equestrian community, generally known as Placerita Canyon, and provide adequate buffers and graduated transitional design to ensure existing neighborhood protection and compatibility of character resulting from any proposed development...

Santa Clarita Municipal Code section 17.39.020(B)(2), et seq.

As is apparent, the PCSSD sets forth numerous requirements that Blackhall must satisfy since its Project Site is located within the PCSSD. These include concerns critical to

preserve the “secluded, rural equestrian character of the community.” Items such as adhering to the equestrian nature of the PCSSD; keeping lights and noise down to defined levels; and, addressing the inherent increase in traffic, with solutions that track with the PCSSD, among many other issues.

As outlined in the Initial Study, all these concerns (which have been codified into law) will be ignored, since the Initial Study did not even acknowledge in a cursory fashion that Blackhall is governed by the PCSSD. This failure needs to be addressed in the forthcoming EIR.

DIVISION OF AN ESTABLISHED COMMUNITY

Perhaps because the Initial Study missed the PCSSD, it also incorrectly mischaracterized some of the likely environmental impacts from the project. For instance, section XI, LAND USE AND PLANNING, asserts that there will be “No Impact” as a result of the Project physically dividing an established community. Clearly, this is wrong. The Project Site sits in the PCSSD, whose stated purpose is “to protect, maintain, preserve and enhance the secluded, rural equestrian character of the community, to enhance the community’s unique appeal...” The Project must adhere to this standard and the EIR needs to vigorously address this issue.

Likewise, subsection c of section XI mistakenly provides that the Project is not in conflict with policies of agencies with jurisdiction over the project. The City of Santa Clarita established the PCSSD. The City is an agency with jurisdiction over the project. The EIR must examine whether the Project as currently designed adheres to the standards of the PCSSD.

APPLICABILITY OF DOCKWEILER DR. EXTENSION EIR

The Initial Study states, “In conjunction with the Proposed Project, the following modifications to the Dockweiler Drive Extension Project are proposed...”

As of today, we do not know how much the City and Blackhall are depending on the Dockweiler Drive Extension EIR and its conclusions, but this much is clear now. The Final Environmental Impact Report on the Lyons Avenue/Dockweiler Drive Extension Project was prepared in 2018, at least two years before Blackhall bought the Project Site. Thus, it is clear that the 2018 EIR did not sufficiently analyze the traffic impact coming from Blackhall.

The Blackhall Initial Study in Section XVII (a) states that the Project will have a potentially significant impact on the current planned circulation system. The Project will “Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes

of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.”

Further, on page 38, the Initial Study finds, “The Project would intensify land uses in the Project vicinity and generate additional traffic on the local street network, potentially impairing or interfering with an adopted emergency response plan or emergency evacuation plan.” Members of PCPOA were told by a City traffic engineer that the last traffic count study in the Placerita Canyon area was conducted in 2012. Certainly, things have changed in the following ten years, including the growth of The Master’s University. So, a new traffic study is needed to reflect actual current conditions. A study conducted while Master’s is in session is urged.

Page 47 of the Initial Study says, “**Potentially Significant Impact.** The introduction of new land uses within the Project Site would generate additional traffic volumes and stationary noise sources, which may result in exposure of persons or generation of noise levels in excess of standards.”

And, further on page 47, “**Potentially Significant Impact.** As discussed above, the introduction of new land uses within the Project Site would generate additional traffic volumes and stationary noise sources. As such, the Project may result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.”

On Page 52, the Initial Study states, “**Potentially Significant Impact.** The Project would involve development of vacant land and introduction of new uses on-site. This would result in an increase in vehicle trips, which may potentially impact the City’s circulation system. Accordingly, the Project’s potential impacts on the circulation system will be further evaluated in the EIR and mitigation measures identified as necessary.”

Critically, the Initial Study on page 52 identifies the fact that the standards to perform a transportation analysis (which is what the Dockweiler Extension was all about) have changed dramatically since that Dockweiler EIR was finalized. “**Potentially Significant Impact.** SB 743 required the Governor’s Office of Planning and Research to change the way public agencies evaluate transportation impacts of projects under CEQA. Under SB 743, the focus of transportation analysis has shifted from driver delay, which is typically measured by traffic level of service, to a new measurement that better addresses the state’s goals on reduction of GHG emissions, development of multimodal transportation networks, and promotion of a diversity of land uses. CEQA Guidelines Section 15064.3 describes specific considerations for evaluating a project’s transportation impacts. Generally, vehicle miles traveled (VMT) is identified as the most appropriate measure of transportation impacts, replacing level of service, and referring to the amount and distance of automobile travel attributable to a project. Implementation of the Project would introduce new uses on-site and generate additional traffic volumes throughout the

community. Accordingly, the Project's potential impacts related to VMT will be further evaluated in the EIR and mitigation measures identified as necessary."

It should be noted that PCPOA worked closely and in good faith with the City in addressing various traffic calming measures related to the Dockweiler Extension. One alternative that received wide acceptance was a roundabout at the junction of Dockweiler Drive, 12th Street, and Arch Street with a signalized offset T-intersection at Placerita Canyon Road. Attached as **EXHIBIT 2** to this letter is a concept drawing from the EIR for the Dockweiler Extension of that roundabout. Based on discussions and meetings with City staff, it is the understanding of PCPOA that the roundabout design has been approved as the best solution for this intersection. As such, the Blackhall EIR should be using this design for its plan.

The Initial Study makes it apparent that the EIR on Dockweiler Drive Extension does not address the wisdom of the Extension itself under these new circumstances (i.e., the Blackhall Project and new state legislation). This is due to a number of factors, including that the Blackhall Project was never envisioned as a potential use of the land and thus did not enter into the discussion in the EIR preparation. New standards of analyzing traffic impacts from a new Project were not implemented until two years after the EIR was finished.

Therefore, it is questionable whether the conclusions of the Dockweiler Extension EIR hold any relevance to the world Placerita Canyon and its residents will face under the Blackhall Project. The Blackhall EIR must acknowledge this weakness in the Dockweiler EIR and analyze anew the wisdom and environmental impacts of the Dockweiler Extension if the Blackhall Project is adopted. Similarly, the EIR done in 2009 relative to the Masters College Project may need to be reviewed. Also, since it appears that the Project Site has only two points to enter and exit and both feed into Placerita Canyon (both feeding and facing southbound), PCPOA requests the EIR study the impacts of a public safety emergency - natural, manmade or otherwise.

NEWHALL CREEK

Newhall Creek is another area of concern. As confirmed by the Draft EIR for the Dockweiler Extension, Newhall Creek is under the jurisdiction of numerous agencies, including the Army Corps of Engineers, the California Department of Fish and Wildlife and the Regional Water Quality Board. PCPOA is concerned, given the much larger project proposed by Blackhall than what was contemplated by the Dockweiler Extension Project, that the potential impacts on Newhall Creek have not been adequately addressed.

CONCLUSION

As the environmental review for the Blackhall project progresses, PCPOA anticipates that the City will assure that PCPOA will be an integral part of the process, especially

James Chow
Erica Iverson
City of Santa Clarita
May 10, 2022
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now that all parties are aware of the obligation to follow the PCSSD. Please understand that this letter does not represent all of the issues and concerns of the PCPOA.

Please keep me updated on this project and include me on any mailing or notification lists.

Sincerely,

KANOWSKY & ASSOCIATES



Carl J. Kanowsky, Esq.

CJK/as
Encl.

cc: Clients

EXHIBIT 1



Mapping Your City

City of Santa Clarita

Layer List

Layers

Storm Network

Sewer Network

Elevation

Property

Homeowners Associations

City of Santa Clarita

City of Santa Clarita

City of Santa Clarita

City of Santa Clarita

Parks

Business Parks

Schools

Fire Stations

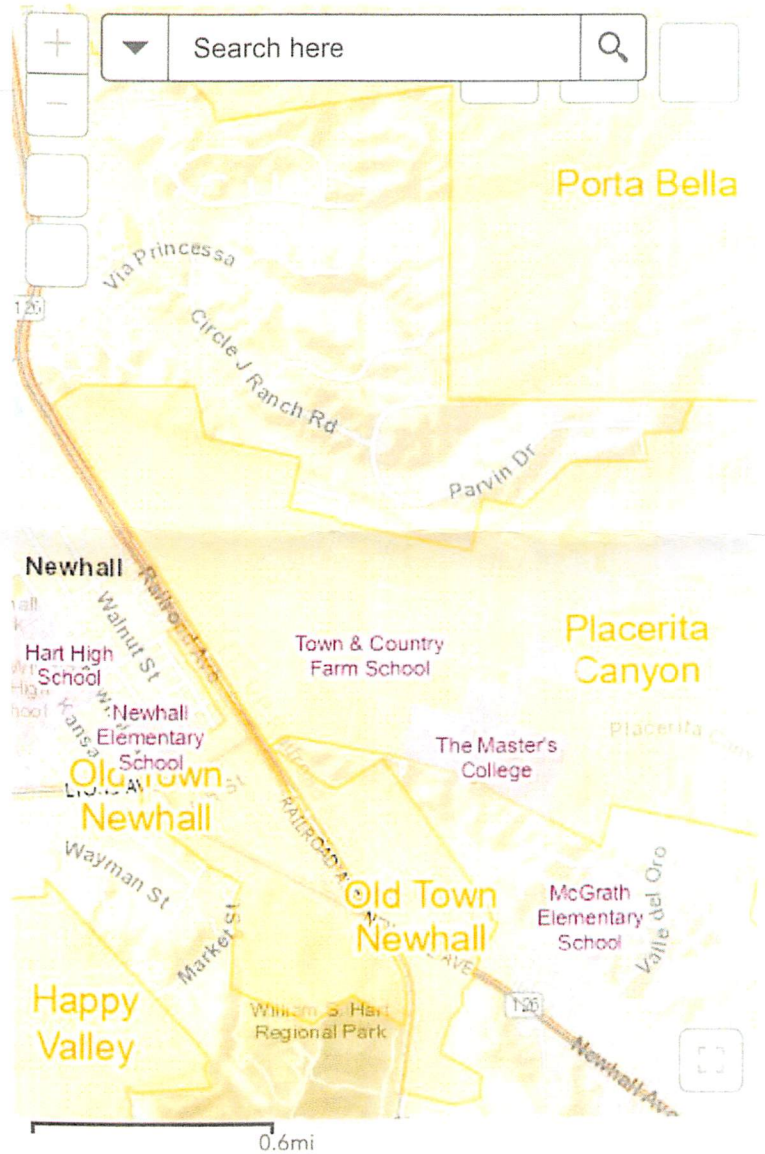
City Facilities

Sheriff Stations

Boundary

Census

Flood Insurance Study (FIS)



Parcel Outlines Schools City of Santa Clarita Boundary Spec

Options

Filter by map extent

Zoom to

Clear selec

Administrative.SDE.SpecialStanda OBJECTID

52,581,842.03

1

224,632,635.17

2

10,662,985.85

3

42,001,311.85

6

3,758,275.66

9

6,697,272.54

10

4,659,973.33

11

8 features 0 selected

EXHIBIT 2

DOCKWEILER EXTENSION UPDATE

City of Santa
Clarita Final
Design Concept:
4-legged
Roundabout
with Signalized T
Intersection

August 2020

