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May 22, 2023

**[VIA EMAIL]**

City of Santa Clarita Planning Division  
**Erika Iverson, Senior Planner – Shadowbox Studios Project Draft EIR**  
23920 Valencia Blvd, Suite 302  
Santa Clarita, CA 91355  
Email: [eiverson@santa-clarita.com](mailto:eiverson@santa-clarita.com)

Re: Shadowbox Studios Project  
Master Case Number 21-109  
Our client: Placerita Canyon Property Owner's Association ("PCPOA")  
Comments to Draft EIR

Dear Ms. Iverson,

This firm has been retained by Placerita Canyon Property Owners Association ("PCPOA") to review and provide comments to the Draft Environmental Impact Report ("DEIR") for the proposed Shadowbox Studios Project ("Project"). Our comments are made on behalf of the Association as a whole. Members may be making individual comments.

**REQUEST FOR AN EXTENSION TO PUBLIC COMMENT PERIOD**

The record should reflect that on April 19, 2023, PCPOA initially requested a 15-day extension of the period within which to provide public comments to the DEIR. This request was made on two bases. The obvious is that the Project, as proposed, will result in over 1.2 million square feet of development and likely over 3,000 new people into an area which is (i) adjacent to an area which is, by City design and standards, of an equestrian, pastoral and quasi-rural character; (ii) already subject to traffic congestion; and (iii) which will essentially gridlock the only emergency escape route for Canyon residents and their livestock during the inevitable disaster, including wildfire, flooding, or earthquake.

A subsequent extension request by PCPOA was made on May 16<sup>th</sup> because the City did not provide public record documents requested through a public records request of April 19, 2023 until approximately 4:53 PM on May 15<sup>th</sup>. PCPOA's requests were denied with the only stated reason for the denial being (paraphrasing) that the City has dealt with bigger EIRs in the past. The denial of PCPOA's modest request for an extension was shocking given that the purpose of CEQA is to ferret out all relevant information regarding potential environmental impacts of a proposed project so that, "...the government and public [may be informed] about a proposed activity's potential environmental impacts..." (*California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 381.) PCPOA consists of a group of property owners

who are not experienced or adept enough to conduct an evaluation or provide meaningful input so that the ultimate decision makers have all the necessary information in front of them when making their decision. That is the heart of CEQA and one would expect that the City, keeping the interests of everyone in mind, would welcome as much meaningful and diverse input as possible from its citizens who will be most impacted by the Project.

Unfortunately, the Planning Commission summarily denied the modest extension requested by PCPOA. The only reasons for the denial articulated by the Planning Commission were that the City has dealt with bigger EIRs before and that the public had enough time to comment on those without extensions. This “reasoning” is both wrong-headed and bewildering. First, the impact on the environment and community of every project is different. Were those “big” EIRs for projects with the potential to jeopardize the safety and quality of life in a manner similar to Shadowbox’s impact? Was there an active group who was attempting a good faith evaluation and comment on the project’s impact? The bewildering part of the reasoning is that the requested extension was extremely modest and expressly authorized under CEQA Guidelines section 15105. The modest extension would have had very little effect on the progress of the Project. What possible detriment or prejudice could there be from a two-week extension to comment?

Moreover, on April 19, 2023, our firm, on behalf of PCPOA, provided a public records request to the City for documents that would assist in PCPOA’s review of the DEIR. On May 1, 2023, after our inquiry, we were told that pursuant to the extension provisions of the Public Records Act, no response would be forthcoming from the City until May 15<sup>th</sup>. Thereafter, close to 5 PM on May 15, 2023, the day before the May 16<sup>th</sup> Planning Commission Hearing, we received what can best be described as a document dump from the City. The next day, at the Hearing, PCPOA’s request for an extension of the time to comment was denied.<sup>1</sup>

Because of the frivolous decision of the Planning Commission to deny the request for an extension, the City’s CEQA process for the Project is flawed. The public was not given adequate time or opportunity to provide meaningful comments. This is not only bad government but not in line with the purpose underlying CEQA. Should any legal action challenging the Project or the

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<sup>1</sup> Having had an opportunity to merely scan the contents of the document dump, we find that the developer appears to have been provided at least a part of the administrative draft EIR well before it was released to the public and has, in fact, requested that certain language be inserted in the mitigation measures to meet the developer’s desires. We are looking into this further as time permits but, based on what we have seen, whether the City seems to have decided that the preparation of this DEIR is a joint effort between the consultant, the developer, and the City. While a developer’s involvement at that stage may not technically be prohibited by CEQA, many, if not most jurisdictions, avoid this appearance of impropriety and provide the developer and the public the draft EIR at the same time reserving the administrative draft for internal staff comments. The developer’s early and preferential input places the City’s refusal to grant the Association (and the public) a 15-day extension in an unflattering light.

process be necessary, we intend to raise the inadequate and inequitable duration of the comment period. Furthermore, by failing to provide adequate time to review and comment on critical project issues raised by the DEIR, we intend to continue to provide comments on the DEIR up to the time of certification. *Bakersfield Citizens for Local Control v. City of Bakersfield* 124 Cal. App. 1184 (2004); *Galente Vineyards v. Monterey Peninsula Water Management Dist.* 60 Cal. App. 1109 (1997). It is unfortunate that the City has put itself and the developer in this position.

### **DEIR Comments**

We want to indicate that PCPOA does not necessarily oppose the concept of the Project. It recognizes that motion picture production has historically been and should continue to be an important part of the character of Santa Clarita. Evidence of that fact can be found with Melody Ranch Movie Ranch around which the Placerita Canyon community developed. That said, PCPOA is committed that the expansion of film production neither impact the safety of Placerita Canyon residents nor forever destroy the rural, equestrian-oriented environment which has been fostered by government and private regulation dating back well before City incorporation. Critical to preserving the rural and equestrian-oriented lifestyle is the CEQA requirement that the DEIR provide a complete and good faith analysis of all potential significant project impacts. We believe that the draft DEIR fails to meet that standard and is so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment are precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043.) Below we set out more specific comments to the DEIR on an itemized basis and based on time constraints and limited available information. Initially, we point out foundational flaws that permeate many sections of the document.

- We question an environmental document for a project of the magnitude proposed arriving at the conclusion that there are no significant environmental impacts other than biological, cultural and geological. The DEIR found **no impacts** to anything relating to the safety and environment of the residents of the Placerita Canyon Community. The Project includes nearly 1.3 million square feet of structures, 2400 parking spaces, will create new on-site jobs for roughly 3,000 people, includes 19 massive sound stages, three-story office buildings and a five-story parking structure (necessitating a variance of the City's height restrictions and creating some of the Valley's highest structures). All this is located (i) in an area currently designated as residential under the City's General Plan and Zoning Ordinance; (ii) adjacent to a neighborhood that, through careful planning and management, is a semi-rural equestrian setting; and (iii) in a historically high wildfire zone with very limited means of emergency ingress and egress which will be dramatically limited by setting at least 3,000 souls with 2,500 vehicles at the mouth of such the emergency egress point. "The EIR must contain facts and analysis, not just the bare conclusions of the agency," and, "...must include detail sufficient to enable those who did not participate in

its preparation to understand and to consider meaningfully the issues raised by the proposed project.” (*Association of Irrigated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1390.) We will provide more detail below but, on its face, the premise that this enormous project is consistent with the neighboring community and **has no significant environmental impacts** is difficult to believe, if not completely absurd. Given that the DEIR finds no impacts to the surrounding community, no mitigation measures are imposed nor are conditions of approval suggested. Thus, there will be no meaningful community and safety protections in place.

- Much of the analysis relating to traffic, critically including emergency ingress and egress, seems to assume that the Dockweiler improvement and extension will be completed before the Project is operational. However, that is neither a mitigation measure nor, so far as we can tell, a precondition of this project. In fact, based upon the information we were able to glean in our brief review of the City’s last minute document dump, the developer is adamant that it is not responsible for those (and other related improvements) but, rather, are obligations of the City. Unless the Project operations are conditioned on the completion of the Dockweiler improvements, the analysis within the DEIR is nonsensical, useless, and inappropriate under CEQA. CEQA requires that the City use as its baseline, with very limited exceptions, "...physical environmental conditions as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced..." The Dockweiler project is not yet complete rendering the City's environmental analysis deficient to the extent it relies on the completed project as its baseline for CEQA analysis. We recognize the City’s statement that it intends to complete the project but there would be nothing unusual for a planned City improvement to be delayed for years or abandoned altogether. At the May 16, 2023 Planning Commission meeting, questions were asked of both the City and the traffic consultant attempting to clarify the extent of reliance on the Dockweiler project in the DEIR and its timing. The responses were obtuse leaving the issue extremely unclear. It is a very simple proposition and deserves a very simple answer. Simply put, if completion of the Dockweiler Project is not a mitigation measure or condition of Project approval, the DEIR is worthless and violates the requirements of CEQA.
- The cavalier attitude of the DEIR with respect to emergency evacuation is befuddling. The Project will add 2,500 vehicles to an already congested area at the “mouth” of the primary emergency ingress, egress point yet the DEIR does little if anything to address this other than note that the evacuation time will be reduced if and when the Dockweiler improvements are made. Placerita Canyon is an area of extreme wildfire danger and emergency ingress, egress is critical for the safety of the residents. The fact evacuation

will necessarily include many horse trailers (either coming in or leaving) to evacuate horses and other livestock was not considered. The evacuation of horses which is an integral part of the character of Placerita Canyon must be taken into account in evaluating the safety of the Project. Moreover, the DEIR summarily dismisses the roundabout concept which could significantly assist in aiding emergency evacuation and fails to discuss the possibility of providing an additional emergency ingress, egress route for Placerita Canyon. These omissions, on what is the most critical impact needing to be analyzed, are disturbing and render the DEIR inadequate and flawed.

#### 4.1 Aesthetics

The DEIR notes that the Project is subject to the Santa Clarita Community Character and Design Guidelines (“Design Guidelines”) noting that the Design Guidelines are “intended to ensure that existing and future development is comparable in **size, scale and appearance with the existing neighborhood character...**” and that the site “is located within the Placerita Canyon subcommunity, which is identified by the guidelines as a **rural, oak-studded, equestrian-oriented residential area...**” Elsewhere, the DEIR notes that the current general plan and zoning designation for the Project Site, consistent with the Design Guidelines, is residential. The DEIR goes on to acknowledge that the Project site is located in the Placerita Canyon Special Standards District which is made up “primarily of low-density, equestrian-oriented residential neighborhoods located *east* of the Project Site.”

With that regulatory background, the Aesthetics analysis of the DEIR discusses the impact of the Project on surrounding views. Of particular concern to Association members are the views “from the East” which, as noted are “*residential properties...considered sensitive viewing locations.*” The DEIR analysis deftly limits the Project characteristics considered in the view analysis to the catering building and the facilities building and provides that those two buildings will be screened from “largely screened from the adjacent residential uses to the east by the nursery, landscaping and fencing.” In other words, the City acknowledges that the Project will negatively impact the views from the sensitive viewing locations but puts forward the nursery, landscaping and fencing as supposedly mitigating the impact. (The DEIR, again, coyly, does not use the term “mitigate” but that is the only conclusion that can be drawn from the analysis). Nevertheless, despite the clear evidence and analysis to the contrary, the DEIR finds that no mitigation measures are required to protect sensitive viewing locations. That is contrary to the analysis. One must wonder why these necessary screening measures (never mind if they work) were not included as a mitigation measure to ensure that the developer and future owners both construct and maintain the Project to the sensitive viewing locations.

A second issue with the analysis of the impacts of the views from the sensitive viewing areas is the fact that the analysis was limited to two, relatively small (at least in the scope of the

Project) buildings. Are we to assume that the 19 foot sound stages, three-story office buildings and five story parking structure (which exceed the City's existing maximum height restrictions for this zone) will simply be outside of view from the sensitive areas? Perhaps, though unlikely, that is the case. The DEIR, however, provides no analysis or evidence to support that very questionable conclusion and thereby fails to its purpose. CEQA requires, and the City and public should expect, a full analysis of the Project impacts. That full analysis requires an analysis of all potential and foreseeable impacts. The intrusion of the massive structures proposed by the Project – which, to reiterate, exceed the maximum allowable height for the MXN mixed-use zone – will certainly have a negative impact on the sensitive viewing location of the Placerita Canyon Community.

#### **4.10 Land Use Planning**

The DEIR analysis with respect to Land Use Planning is a bit of a shell game. The status quo is that the Project Site is designated for residential use under the City's General Plan and Zoning Ordinance (974 units per Table 5-1 of the DEIR). Properly designed and developed housing on the Project Site would meet the current designation and could avoid the inherent conflict with the rural and equestrian- oriented residential adjacent neighborhood. The Project, which includes a change in the land use designation from residential to industrial, by its very nature creates a significant environmental impact particularly on the Placerita Canyon Community. Where there was housing, there is now a massive industrial development. There is an impact.

In its analysis, the DEIR focuses on the Old Town Newhall Specific Plan standards and simply declares, without any real analysis, that due to the promised architectural treatment of the massive structures, the Project looks good enough to fit in with the design guidelines for the Newhall Community. By contrast, the Placerita Canyon Special Standards District discussion is limited to a single block in Table 4.10-2 labeled "Applicable General Plan Policies." In that block, while noting the requirement to "ensure compatibility of development with existing rural equestrian lots and the adjacent Forest Land....City and the Placerita Canyon Property Owners Association shall work together to amend the PCSSD in the Unified Development Code to provide additional certainty and expectations for the developed areas within the District to create flexibility and continuity, subject to the provisions outlined above, for undeveloped properties in the District."

To our knowledge, the City has not worked with PCPOA to develop amended standards applicable to undeveloped properties. In fact, the current PCSSD standards are not discussed in detail in the DEIR and, if they were, it would be abundantly clear that the Project does not meet those standards. If the suggestion is that those standards should be amended to address this Project and thereby satisfy the City's Land Use Policy 1.2.6, there should be discussion and analysis recognizing and detailing the PCSSD standards and analyzing what must be addressed and amended to accommodate the Project. It is simply inadequate to cite the policy and its requirements and then avoid any discussion of the specifics. The question is not whether there is

an impact but what can and should be done to address those impacts. Given the conflicting character of the Project with the established Placerita Canyon Community, this discussion would likely be somewhat difficult. Difficult or not, the analysis must be undertaken.

Moreover, under the heading of “Consistency”, there are only two factors mentioned, both of which are inadequate to ensure that the Project is compatible with the surrounding area. One of those is the simple statement that the Project will have to go through other City processes, which are described only in very general terms without any detail or explanation as to how they might shape the project or, more importantly, what project characteristics should be analyzed to ensure compatibility. In short, any compatibility analysis relating to the Placerita Canyon Community is omitted. The City’s staff report presented during the Planning Commission’s May 16 meeting was woefully inadequate in addressing these myriad issues; at a minimum, these new impacts are sufficient to require additional discussion and mitigation measures which will trigger the requirement that the City recirculate this EIR for public review under *CEQA Regulations*. The proverbial “can” is kicked down some loosely described road without any guidance. This simply does not come anywhere close to the level of analysis on which the decision makers, ultimately the City Council, can rely. This deferral of review, analysis and mitigation is inadequate and violates CEQA requirements.

The second factor noted in the consistency review is that “the Project’s location in the North Newhall Area already imposes the requirement of public participation and outreach to the Placerita Canyon Property Owners Association.” This statement is misleading. First, Policy LU 1.2.6 has the requirement that the City and PCPOA work together to develop standards for new development. That requirement is prospective-it must happen before a new project is being considered. That did not happen and it is no answer to now say that a retrospective look at the District standards is sufficient to satisfy Policy LU 1.2.6 to the level of General Plan compatibility. The DEIR suggesting that closing the barn door after the horse leaves is an acceptable level of analysis. It is also somewhat ironic if not insulting that the DEIR refers to the “public participation and outreach to the Placerita Canyon Property Owners Association” while, at the same time, the City is trying to rush through the Project approval by denying the Association even a modest request to extend the time for public comment on the DEIR. We fully understand that navigating a general plan is a somewhat tedious exercise requiring a balance of competing policies. Our concern is that the DEIR does not provide sufficient information or analysis so that the City can meaningfully balance those policies. Certainly, this is a “can” that should be addressed now and not delayed until after Project approval renders the analysis moot.

The DEIR also purports to consider whether the Project will be consistent with the City Municipal Code. Our attention is focused on the “analysis” given to consistency with the Placerita Canyon Special Standards District. We have noted above that the purpose of the District is to protect the rural and equestrian-oriented nature of the Placerita Canyon Community. The “analysis” provided by the DEIR at page 4.10-39 is to simply ignore anything to do with the

character of the residential community and, instead, make selective reference to vague and general Project characteristics none of which appear in the form of mitigation measures. For example, the supposed nursery with the MWD right-of-way is cited as a project characteristic shielding the neighbors from the industrial views. We don't agree that this is sufficient but, it does evidence two points that run through the flawed DEIR. One, there is no discussion as to whether the MWD has agreed to allow the nursery. One is left to wonder whether there is an agreement in place and, assuming there is one, what are the terms of that agreement. If the nursery is an important factor in protecting the neighborhood from industrial views (and it must be as it is mentioned many times throughout the DEIR), then it is mandatory that the nursery be something real and achievable and not simply something a developer intends but is not obligated to implement.

Along the same lines, the DEIR consistently equates project characteristics with mitigation and accepts that those characteristics will be in place. This is a flawed analysis. The analysis should be that the Project does have significant impacts but there are mitigation measures that reduce those impacts to insignificance. The analysis should include the effect upon the Special Standards District for Placerita Canyon. These mitigation measures will be used by the City to set conditions of approval for the Project to ensure that the "mitigating" project characteristics are mandatory. Thus, assuming it does act as an acceptable shield, the creation and maintenance of the nursery, or its equivalent, should be a mitigation measure mandating the maintenance of the nursery throughout the life of the Project. Otherwise, the DEIR is simply analyzing a project in a form that may or may not happen. In short, the acceptance of project characteristics as "mitigating" potential impacts, without imposing those characteristics as mitigation measures is a useless exercise and renders the DEIR and all CEQA analysis fatally flawed. It is difficult to accept and understand why the DEIR consistently goes to such pains to avoid acknowledging the potential impacts, which therefore preclude imposing measures to mitigate those impacts to a level of insignificance.<sup>2</sup>

#### **4.12 Population and Housing**

The EIR notes that the City's state housing allocation is approximately 10,000. The EIR also recognizes that the Project Site's current land use designation is residential with the potential

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<sup>2</sup> This comment is applicable throughout the DEIR. Nowhere in the DEIR, at least for any topic relevant to the safety and lifestyle of the Placerita Canyon Community, is it acknowledged that there will be significant environmental impacts which must be addressed by mitigation measures and conditions of approval. Instead, mitigation of those impacts is left up to the goodwill of the developer for implementation and maintenance. That is the very purpose of an EIR. As presented by the DEIR, the City is left to simply accept the developer's goodwill to implement project characteristics that are relied upon by the DEIR to determine to find no significant impacts. This is fundamentally inapposite to the spirit and letter of CEQA.



for providing 974 additional housing units, of which almost 20% are affordable, to the City's housing stock.<sup>3</sup> The Project will remove the possibility of residential development on the Project Site and thereby remove nearly 10% of potential housing units potentially available within the City. At the same time, the Project will create approximately 2,400 **new jobs**. Thus, based on the DEIR the impact of the Project will be to bring 2,400 new employees to the area many of which will be hoping to live close to work. In fact, employees living close to work is the key to the DEIR's very analysis of Transportation impacts because, in the DEIR's theory, those employees will be commuting by bicycle or municipal transit. This obviously leaves the multi-pronged dilemma, unanswered or even analyzed in the DEIR as to (i) how the loss of 974 residential units will impact the ability of the City to meet its housing allocation obligation; and (ii) what impact, if any, will the influx of 2,400 new employees have on the housing market in the City and surrounding areas. These factors need to be analyzed and evaluated to determine the impacts of the Project on housing. There DEIR fails to do so.

There is some indication that the DEIR recognizes the dilemma which it purports to solve by arriving at the inexplicable conclusion that: "Rather than increase population growth in the City, it is anticipated that the employment growth would be filled by existing residents of the City." This statement, which essentially forms the foundation of the DEIR's conclusion that the Project will have no impact on housing, is almost certainly false. We have not had the time or opportunity to study this issue but unless there are 2,400 souls in Santa Clarita qualified and waiting to work in the film production industry, we believe that the new jobs will not be "filled by existing residents". Rather, it is almost certain that these new jobs will be filled by new residents or employees who live outside the City but want to relocate closer to work. At a minimum, the DEIR needs to provide the basis for its conclusion that "existing residents" will be lining up to work at the new Project. Further, if that is the basis for the finding, what, if any program or incentive will be attached as a mitigation measure or a condition of approval to even promote the hiring of existing residents, if the DEIR conclusion is complete nonsense and renders the entire Population and Housing analysis of the DEIR inadequate.

#### 4.14 Transportation

The conclusion of the DEIR that there are no significant Transportation impacts, on its face, is ridiculous. How is it even possible to conclude that adding a project of this magnitude, with parking for 2,400 vehicles (not to mention the traffic for support services, deliveries, etc.), located along an already congested area will **have no significant environmental impact without the imposition of any mitigation measures?** The answer is obviously that it will have significant impacts on the transportation environment. The only way to reach the contrary conclusion of the

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<sup>3</sup> There is an internal inconsistency in the DEIR as to whether the current land use designation of the Project Site will allow 974 or 924 new dwelling units. Regardless of the number, the concept is the same.

DEIR is to ignore the reality of the situation and attempt to hide behind a wall of statistics and misguided assumptions.

Our detailed comments to the transportation section of the DEIR are generally set out in the attached May 19, 2023 review letter from Alex Tabrizi, PE, TE (a licensed traffic engineer). In his review letter, Mr. Tabrizi notes many questions and concerns with the transportation analysis of the DEIR. We incorporate each of his assessments and comments. We request that they be addressed in the Final EIR.

Nevertheless, in addition to Mr. Tabrizi's comments, we will address some of the problems with the DEIR Transportation analysis. The first issue is whether the Project will be conditioned on the completion of the necessary road improvements particularly the Dockweiler Extension project. It is clear both in analysis and anecdotally that without the Dockweiler Extension project and the other required traffic improvements, the Project will have a significant and potentially disastrous impact on the traffic circulation around the project and, in particular, for the residents of the Placerita Canyon Community. As noted earlier in these comments, a clarification of this position was requested at the May 16, 2023 Planning Commission meeting. This would seem to be a simple and fundamental question. The answers from both City staff and the EIR traffic consultant were far from clear and leave the status of the traffic improvements in relation to the commencement of operations on the Project, unclear. This simple question, which is critical to the Placerita Canyon Community and should be critical to the City. If the answer is that the commencement of business operations on the Project Site is contingent on the completion of the required traffic improvements (most particularly the Dockweiler project), then there will be substantially less questions and comments on the Transportation analysis. If, however, the Project is not contingent on those improvements, the transportation analysis is fatally flawed and completely useless to the City in making the ultimate determination.

We also note that the DEIR finding of "no impacts" is inconsistent with the traffic study on which the analysis is entirely based. Table 16 of the traffic study is a chart of existing Levels of Service potentially impacted by Project traffic. As noted in the attached Tabrizi letter, we question and/or disagree with the data and methodology used to create this table and support the DEIR Transportation conclusion. However, taking Table 16 on its face, there the Project will create a significant impact on the intersection of Railroad and 13<sup>th</sup> Street by dropping the Level of Service to D. This is the intersection through which traffic from the Placerita Canyon Community will travel and, as set out in the traffic study, there will be a significant impact. That finding alone should trigger a response in the DEIR to consider and impose mitigation measures to eliminate that impact. Instead, the DEIR simply ignores it.

Our concern is that the completion of the Dockweiler Extension improvements are not a condition of commencing business operations for the Project. That concern is based on (i) the lack of clarity within the DEIR itself; (ii) the finding that there is no significant impact to

transportation; (iii) because of the finding in (iv) there are **no traffic mitigation measures** set out in the EIR; (v) the failure of City staff and the EIR traffic consultant to give a straight answer to a simple question at the recent Planning Commission meeting; and (vi) changes made to the DEIR regarding who bears the responsibility for traffic improvements which were made as the insistence of the developer and lead to the conclusion that it has no intention of slowing down if the City does not complete the required improvements.<sup>4</sup>

We also must question the conclusion of DEIR that the Project will have no significant impact, without any mitigation measures, on emergency evacuation. We will address that concern in more detail in the Wildfire section below. It is significant and obvious that the addition of the Project will dramatically and potentially fatally, lower the evacuation time for the Placerita Canyon Community including the many horses living in an equestrian-oriented community.

We also question the degree of analysis that went into rejecting the idea of a traffic circle. It seems that the concept, which PCPOA finds interesting and promising, is now being rejected out of hand. We believe that a proper analysis could conclude that the traffic circle reduces the traffic impacts for both day to day traffic and, more importantly, for emergency evacuation.

#### **4.17 Wildfire**

The most critical aspect of an environmental analysis for the Project should have been its impact on the safety of the surrounding community. Specifically, as we have noted repeatedly, the Project is located at the sole emergency exit point for the Placerita Canyon Community.<sup>5</sup> Under current conditions, the evacuation time for the Community is approximately 2.5 hours. We believe that estimate is low because it does not consider the number of horses that will need to be evacuated from the “equestrian-oriented” Community.

As with Transportation, we have provided comments from an expert in the field, former Cal Fire Chief, Rob Lewin. Mr. Lewin has devoted his adult life to fire safety. With his work in San Luis Obispo and Santa Barbara Counties, Chief Lewin has a valuable reservoir of expertise regarding all aspects of wildfires of the type that inevitably threaten the Project area. We incorporate Mr. Lewin’s comments into this letter but will, nevertheless, highlight some of the particularly egregious analytical failures of the EIR he observed.

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<sup>4</sup> We note that the charts provided by the traffic study carry a footnote that certain Dockweiler intersections will be “constructed by the Project.” We fail to see any requirements or mitigation measures in the DEIR requiring the construction any intersections by the Project. If, as it seems, that was the basis for the traffic study then either those measures need to be imposed or the traffic study redone.

<sup>5</sup> There is a second potential exit point for some residents, but it is subject to physical and regulatory limitations. Moreover, given the configuration of Community with respect to historic fire patterns, the second potential exit is very likely to be toward the fire.

First, we note that most of the analysis of the DEIR wildfire discussion is focused on the safety and evacuation of the Project itself. Given that (i) the Project is located adjacent to escape routes without much immediate concern for evacuation bottlenecks; and (ii) the Project, unlike many of the adjacent homes, will be constructed under today's Fire Code standards, it is not surprising that the conclusion of the DEIR is that there will be no significant wildfire impact.

The DEIR, however, fails miserably to adequately consider the potential impacts on the Placerita Canyon Community. The most glaring example is that the Wildfire analysis, which is based entirely on the Dudek Fire Protection Study, relies entirely on the Gibson traffic study for its analysis of the evacuation patterns and timing in and around the project. We note that even though the Fire Protection Study references an evacuation analysis, it performs none. More critical, however, is the fact that the Gibson traffic study **failed to perform any analysis of the evacuation time for Placerita Canyon except with the completion of the Dockweiler improvements.** Table 24A provides the data for current evacuation times from Placerita Canyon. According to Table 24A, which did not take into account livestock removal, current evacuation time for Placerita Canyon is 2.6 hours. Table 24B purports to be the "after" condition in which evacuation times are reduced to 1.5 hours. However, Table 24B assumes that the Dockweiler improvements are complete. The comparison of these two tables renders both the Transportation analysis and the Wildfire analysis inadequate and in fact virtually useless in analyzing Project impacts.

Unless the Project is going to be conditioned on the completion of Dockweiler, the DEIR must study the evacuation time from Placerita Canyon with the Project in full operation and without the Dockweiler improvements. Failing to do so leaves the City in the position of making a decision without the very information which an EIR is intended to provide. The most important question to be asked and answered is how much additional evacuation delay for Placerita will occur upon completion of the Project and without the Dockweiler extension. That is the only sure situation that will exist is the Project is approved and the one issue that must be addressed to determine potential Project impacts. The failure of the DEIR to do so is dumbfounding and renders the DEIR fatally flawed as to what is arguably the most important issue to be addressed; the safety of the Placerita Canyon Community. Unless and until that analysis is performed and made public for comment, the EIR for this Project cannot be certified. Safety cannot be sacrificed for expediency and the PCPOA is committed to making sure its members and other residents of Placerita Canyon are protected. Because, based on inadequate analysis, the DEIR found no significant impacts to fire safety, **there are no mitigation measures addressing wildfire safety. For a project of this magnitude, adjacent to older residential development with limited access and located in an area where the question is not if there will be a wildfire but only when. It is a shocking and irresponsible failure in the DEIR to attach any mitigation conditions to the Project to protect the Placerita Canyon Community.**

As Chief Lewin provides, a wildfire moves at 4.7 miles per hour and can advance more rapidly when the frequent Santa Ana winds are strong and the terrain dry. Given all these factors, it is obvious that, even under current conditions and evacuation times, the situation is perilous. Allowing the Project to be approved with mitigation measures addressing the potentially deadly impact on evacuation times is inexcusable and renders the DEIR fatally flawed. The City cannot let the presence of a new shiny object distract it from the primary function of government; protecting its citizens.

Finally, at least for this letter, one solution for the evacuation problem might be to create a new emergency egress point for the Placerita Canyon Community. A review of topographical maps seems to indicate that there is a potential for such emergency egress point through the adjacent Circle J development. This potential should have been evaluated as a potential mitigation measure for the Project's obvious impact on wildfire safety. It does not appear that such a route, or any alternative emergency route, was even considered.

## 5.0 Alternatives

The Alternative analysis of the DEIR is defective in that it fails to adequately balance the relative impacts and benefits of the competing alternatives. In large part, this is due to the deficiencies in remainder of the EIR analysis which basically finds no impacts other than Biological and Tribal resources. Starting from the premise of no Project impact, it's not surprising that the Alternatives discussion is woeful. If you start from the false proposition that the Project creates no impacts, you are not likely to come up with a better alternative. Curiously, despite deeming the Project to have no impact, the DEIR does reluctantly admit that a smaller project, Alternative 3, which would have even less impacts (although less than none is a difficult concept). In short, so long as the remainder of the DEIR is defective, the meager Alternatives analysis in the DEIR will remain inadequate.

We note one example. Saugus Speedway was "considered" as an alternative site. It was rejected on two grounds neither of which appear to be valid.

*Similar to the Project Site, the property is relatively flat... In addition, this property is included on the City's inventory of sites suitable for housing development; **development of the Project on this site would affect the City's ability to meet the State's Regional Housing Needs Allocation requirement and may have a potentially significant impact on population and housing.** Therefore, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.*

It is very curious that the loss of housing stock is given as a reason to reject the Speedway, yet the loss of 974 housing units due to the Project was barely discussed and not considered as a

significant environmental impact. This inconsistency demonstrates that the DEIR analysis was defective as to Population and Housing, Alternatives, or both.

### **Conclusion**

The DEIR fails to meet the required CEQA standards on several levels. As noted in this letter and the attached expert comments, there are significant impacts from the Project that would be apparent based on a project environmental analysis. Those impacts could then be addressed by mitigation measures or, if necessary, adoption of a statement of overriding considerations. For whatever reason, the DEIR reads like more like a preordained approval authored by the developer's public relations consultant rather than providing the analysis necessary to protect the citizens of Santa Clarita and, more specifically, the residents of Placerita Canyon. As noted, due to the inexplicable refusal of the City to grant additional time for public comment, we reserve the right to continue to provide and will be providing comments on the DEIR and final EIR until certification and the filing of a notice of determination. Nothing herein should be construed as a waiver of any of PCPOA's rights or remedies under applicable law.

We welcome any questions or comments. Please contact the undersigned or Jeff Hacker.

Very truly yours,

ADAMSKI MOROSKI MADDEN  
CUMBERLAND & GREEN LLP



THOMAS D. GREEN



May 22, 2023

Mr. Russ Hand, President  
PLACERITA CANYON PROPERTY OWNERS ASSOCIATION  
PO Box 220301  
Santa Clarita, CA 91322

**Subject: Shadowbox Studios Project Transportation Study & Parking Analysis Peer Review, City of Santa Clarita, California**

Dear Mr. Hand,

MAT Engineering, Inc. (Consultant) conducted a peer review of the transportation/traffic analysis and parking analysis study for the Shadowbox Studios project and provides the following perspectives.

The peer review evaluated the following documents:

- *Draft Transportation Assessment for Shadowbox Studios (Gibson Transportation Consulting, Inc., January 2023).*
- *Shadowbox Studios Parking Analysis Form (Gibson Transportation Consulting, Inc., December 20, 2022); and*
- *Shadowbox Studios Land Use Alternatives Trip Generation Comparisons (Gibson Transportation Consulting, Inc.).*

**Project Description:**

As described in the Transportation Study:

- **Project Location:** In total, the Project Site is approximately 95.2 acres over multiple contiguous parcels; approximately 72 acres of the site will be developed and approximately 23.2 acres will remain undeveloped. The Project Site is bounded by vacant land to the north, vacant land and residential uses to the east, 12<sup>th</sup> Street and 13<sup>th</sup> Street to the south, and Railroad Avenue, the railroad and Arch Street to the west.

- **Existing Land Uses:** The project site is currently vacant.
- **Project Land Uses:** The Project includes the development of 476,000 square feet (sf) of stage area, 608,500 sf of studio support (including 37,500 sf of catering space), and 210,000 sf of production office. Base camp areas, a parking structure, and potential back lot space will also be provided. The Project would be constructed continuously in one phase and be completed by 2026
- **Previous Approval:** One previous proposal for this site under a different development group would have constructed 310 single-family residential units. This proposal was being processed by the City and a Draft Environmental Impact Report was pending release to the public when the property was acquired, and the full purpose film studio was proposed.
- **Project Parking:** The Project would provide up to 2,468 vehicle parking spaces in one five-level parking structure accommodating 1,070 parking spaces and three surface parking lots accommodating an additional 1,398 spaces (including parking for electric vehicles). Included in the 2,468 on-campus parking spaces, 296 parking spaces for electric vehicles would be provided, as would 56 accessible spaces compliant with the Americans with Disabilities Act (ADA). The Project would also provide 170 bicycle parking spaces (146 long-term and 24 short-term) for Project uses. Chapter 17.53 of the City of Santa Clarita Municipal Code sets forth property development standards. The standards set a height limit of 35 feet which may be increased to a maximum of 45 feet at the discretion of the director. The project parking structure and buildings appear to exceed these standards.
- **Project Vehicular Access:** Primary access to the Project Site is proposed via two driveways on 13<sup>th</sup> Street east of Railroad Avenue. Secondary access is provided via one driveway on 12<sup>th</sup> Street (Gate 3 Driveway east of Arch Street). Internal circulation will be provided by on-campus loop roads that deliver all campus traffic to/from the three proposed driveways. Similar to the previously approved residential project on the site, the Project Site will be served by the proposed but yet to be constructed Dockweiler Drive Extension Project (DDEP), which is claimed would improve access to/from the south. The Shadowbox Project proposes to signalize Arch Street & 13<sup>th</sup> Street & Project Driveway #1 & Project Driveway #2 and locate two driveways at this intersection: Gate 1 Driveway from the north leg and Gate 2 Driveway from the east leg. Arch Street, and possibly a portion of 13<sup>th</sup> Street, may be renamed Dockweiler Drive with completion of the DDEP. All three driveways would include security checkpoints for vehicles and pedestrians that would limit access to the facility to approved employees and visitors.



**Transportation Assessment for Shadowbox Studios (Gibson Transportation Consulting, Inc., January 2023) Review Assessments:**

**Assessment 1:**

Related projects: The analysis assumes an evaluation of traffic to be added by 36 background and cumulative projects. The trip generation statistics are provided in Table 5 and the locations are provided Figure 7. The analysis fails to include an exhibit or data showing the magnitude of trips (trip assignment) added to each movement of the study intersections by these cumulative and background projects.

**Assessment 2:**

Table 6, Project Trip Generation: Trip generation is a fundamental basis for evaluating traffic conditions and is typically based on the rates for various land uses as published by the Institute of Transportation Engineers (ITE) manual. For unique land uses, the trip generation can be estimated using study of similar facilitates. The trip generation for the project appears to be based on empirical rates for studio land uses in the Los Angeles region. To demonstrate the source of data and how the studied sites compare in nature to the proposed project, more information and details on the studied locations and collected data that was used for the study must be provided. Otherwise, there is no basis for these opinions or conclusions.

The trip generation of similar uses from Los Angeles, a denser and more urban area, seems to reflect higher use of public transportation and other modes of transport, resulting in a lower trip generation estimate for a site in Santa Clarita. The only public transportation available in Santa Clarita is the local bus system and Metrolink primarily to downtown Los Angeles.

Furthermore, the trip generation contained in the EIR breaks down the uses into three categories with a trip rate for each use (stage, support, and production office). The EIR does not indicate how the breakdown data was obtained. Was it from the trip survey of similar studios?

**Assessment 3:**

Table 6, Project Trip Generation: The draft EIR does not indicate how the trip generation from the studies was considered or aretypical operations for the land use. How does this trip generation fluctuate throughout the day? What is the project's trip generation for mid-day, later in the evening or weekend conditions?

#### **Assessment 4:**

Page 37, Project Parking: A 20 percent reduction in the parking for the site seems to be assumed for the Jobs Creation Overlay Zone (JCOZ). Considering the unique nature of the land uses, does this reduction still apply to the project and, if so, why?

#### **Assessment 5:**

Level of Service Analysis Scenarios: The study evaluates existing conditions and project opening year conditions. Considering the significance of the proposed project and the magnitude and nature of the project trips, addition of a long-range conditions analysis is appropriate to evaluate the traffic conditions at full area buildout.

#### **Assessment 6:**

State Highway Facilities: Since the project might be considered regionally significant, which we understand there was some comment to that effect, Caltrans should be consulted or involved in development of the scope and review of the traffic study. There is an indication that Caltrans was consulted.

#### **Assessment 7:**

Page 48, CEQA Impact Analysis & VMT: Based on the VMT analysis, the project is stated to have a home-based work VMT of 14.0 compared to the Citywide impact threshold of 15.7. Is the 15.7 figure, 15% below the City's average, or is it the City average? Based on the threshold on page 47 of the report, projects need to have a VMT of 15% or more below the existing City-wide average to have a non-significant VMT impact.

In Table 10, the VMT impact threshold appears to be listed as 14.0 which is different than the 15.7 mentioned in the text.

Footnote C on Table 10 appears to list the City average as 15.7 for year 2020 and 11.7 for year 2040. Hence, the project VMT of 14.0 might not be 15% or more below the City average, indicating a significant VMT impact under CEQA. The data seems to indicate the threshold to be 13.4 ( $15.7 \times 0.85 = 13.34$ ) which is below the project's VMT of 14.0.

Additionally, per the City of Santa Clarita Transportation Analysis Updates (Fehr & Peers, May 19, 2020), the baseline home-based work VMT for the City is listed as 18.4 for year 2020 and 13.5 for year 2040.

### **Assessment 8:**

Level of Service Analysis Time Frames: The level of service study evaluates traffic conditions during the typical weekday from 7:00 AM to 9:00 AM and 4:00 PM to 6:00 PM.

There are schools near the project site, including the Master's College, Hart High School, Placerita Junior High, Old Orchard Elementary School, and Peachland Elementary School. Also, there are well attended Churches in the Canyon and adjoining areas. Typically, when schools are nearby, the study needs to include an analysis of the school traffic and school arrival and release times. It is recommended the analysis time frames be expanded to include school and church traffic.

As stated on Page 63 of the report, there are two schools located within 0.25 miles of the project site. There is no analysis of the impacts posed by the schools or churches in the Canyon.

### **Assessment 9:**

Vehicular Queue at Driveways: The draft EIR does not indicate whether the empirical data collected at the sample Los Angeles sites include data on vehicular queues at the entrances. Since the main access is on 13<sup>th</sup> Street, adequate storage capacity needs to be provided to keep vehicles from queuing outside the site and onto public right of way. This appears to be unaccounted for.

### **Assessment 10:**

Queue & Level of Service Analysis: The draft EIR does not assume existing traffic signal timing data based on information provided by the City and Caltrans. If optimized traffic signal timing is used, the vehicular queues and level of service probably do not match existing field conditions.

### **Assessment 11:**

Table 11, Project Trips on Ramp Intersections: The table indicates a small number of project trips added to the freeway ramps. Considering the project's peak hour trip generation (605 AM peak hour trips and 684 PM peak hour trips) and the regional access provided via State Route 14 and Interstate 5 Freeways, a larger portion of the project trips will be traveling through these ramp intersections. Especially, since the majority of the trips should be coming from outside the City and from the greater Los Angeles and nearby areas. It is recommended, the project trip distribution be revised to reflect a larger portion of project trips at the freeways.

### **Assessment 12:**

Table 12, Vehicular Queues at Ramps: The draft EIR analysis indicates a vehicular queue of between 8 to 43 feet for the ramps during future without and with project conditions. The EIR is devoid of any information on how does this compare to the existing vehicular queues at the ramps/ For instance, are there currently minimal queues present at the ramps during the peak hours? The result showing 8 to 43 feet indicates a queue of one to two vehicles, which appears to be unsupported by the data .

### **Assessment 13:**

Page 67, Project Trip Distribution: The draft EIR failed to provide the source and methodology for determination of project trip distribution assumptions. The report states that the distributions are based on patterns developed in the City's travel demand forecasting model. There is no way to tell whether the distribution for without and with the Dockweiler extension was considered. It cannot be determined if the applicant was using a select zone run with and without the roadway link in the model Further, there is no tie-in or correlation between this project and the construction of the Dockweiler extension even though it appears that many of the assumptions and statistics are based on the actual construction of the Dockweiler extension. At a minimum, the project should not be built until the Dockweiler extension is completed. The draft EIR is devoid of any alternative or interim traffic or evacuation plans in the event the Dockweiler extension is not completed but this project approved and/or constructed.

### **Assessment 14:**

Page 67, Study Intersections: It is recommended the study evaluate the access at Gate 3 to evaluate level of service operations at this driveway. As stated on Page 67, site access driveways should be included for analysis.

Also, the following intersections are recommended to be included in the study (they are not), since I-5 and the 14 Freeway provide regional access to the site from a number of ramp locations:

1. 12<sup>th</sup> Street / Project Access;
2. I-5 Southbound Ramps / Pico Canyon Road - Lyons Avenue;
3. Main Street / Newhall Avenue Roundabout;
4. I-5 Southbound Ramps / Magic Mountain Parkway;
5. I-5 Northbound Ramps / Magic Mountain Parkway;

6. Town Center Drive / Magic Mountain Parkway;
7. Valencia Boulevard / Magic Mountain Parkway;
8. I-5 Southbound Ramps / Valencia Boulevard;
9. I-5 Northbound Ramps / Valencia Boulevard;
10. Rockwell Canyon Road / Valencia Boulevard;
11. McBean Parkway / Valencia Boulevard;
12. I-5 Southbound Ramps / McBean Parkway;
13. I-5 Northbound Ramps / McBean Parkway;
14. Tournament Road / McBean Parkway;
15. Orchard Village Road / McBean Parkway; and
16. Orchard Village Road / Wiley Canyon Road.

**Assessment 15:**

Page 68, Existing Traffic Count Data: Based on the report, the existing traffic counts were obtained from older studies from 2017 and 2019 not current counts. More recent traffic count data needs to be utilized. Alternatively, sampling of newer counts should be performed and compared to the data used in the study to ensure its validity.

**Assessment 16:**

Page 68, Future Traffic Volumes: Based on the draft , the future traffic conditions volumes were obtained from the City's traffic model. However, the report did not provide clarification on how the 36 cumulative projects were accounted for in the traffic projections if the data was obtained from a traffic model. Were the cumulative project trips manually assigned to the roadway network?

**Assessment 17:**

Table 16 and Table 17, Existing Plus Project Level of Service: Some of the delays appear to improve with the added trips from the project without explanation or basis. No information is provided on these improvements. Are they due to optimized traffic signal timing, etc.?

**Assessment 18:**

Table 17, Existing Plus Project Level of Service: A column needs to be added identifying the level of service impacts (yes/no), similar to Table 16.

**Assessment 19:**

Page 70, Existing Plus Project Level of Service: The report states that with the Railroad Crossing Upgrade, the level of service issue identified at the intersection of Railroad Avenue / 13<sup>th</sup> Street will be improved to acceptable LOS. If the Railroad Crossing Upgrade is not implemented for any reason, what improvements would be required to achieve acceptable LOS? Also, the report fails to adequately address traffic congestion at the crossing or incidents causing undue delay such as long trains, and the like.

**Assessment 20:**

Table 18 and 19, Future Conditions Level of Service: Based on the LOS table of results, during future without project conditions, some of the delays at the study intersections, such as Sierra Highway / Newhall Avenue and SR-14 Northbound Ramps / Newhall Avenue appear to improve compared to existing conditions. No information was provided on how these delays are less than existing/current conditions. If the intersection capacity is the same as existing conditions (no improvements assumed), with the additional traffic, the level of service and delay should generally get worse not better.

**Assessment 21:**

Page 72 & Table 19, Roundabout Analysis: No information on the methodology and software that was used for the roundabout analysis was provided. Considering the magnitude of the project's trip generation, a roundabout might not be suitable. This is also acknowledged on Page 81 of the report while discussing the limits of the roundabout during emergency evacuation conditions. This limitation might also apply to the roundabout during typical operations due to high traffic volumes.

**Assessment 22:**

Level of Service Analysis: The study does not include an analysis of future conditions without the Dockweiler extension. It is recommended that a future year analysis without the extension be conducted and included to determine the potential impacts without the roadway extension in place. As stated in page 78 of the report, the implementation of the Dockweiler extension depends on funding availability. That is another reason why these two projects should be linked together.

**Assessment 23:**

Level of Service Analysis: There is no evidence that the analysis for the 13<sup>th</sup> Street / Railroad Avenue accounts for the railroad crossing and frequency. The railroad crossing limits the capacity of the intersection and results in additional delays which impact level of service and vehicular queues.

**Assessment 24:**

Dockweiler Extension: The report fails to provide a figure showing the alignment of the Dockweiler Drive extension and how it connects to Placentia Canyon Road.

**Assessment 25:**

Page 77, Improvement at the Bouquet Canyon Road / Newhall Ranch Road Intersection: The recommended prohibition of westbound U-turns negatively affects access to the existing land uses and Starbucks located at the southeast corner of the intersection.

**Assessment 26:**

Page 77, Improvement at the Bouquet Canyon Road / Valencia Boulevard Intersection: Is the recommended addition of a fourth eastbound through lane feasible? There appears to be existing land uses that should prohibit additional pavement widening.

**Assessment 27:**

Page 78, Improvement at the Sierra Highway / SR-14 Southbound Ramps Intersection: Is the recommended improvement coordinated with Caltrans? There is no evidence that it is. At intersections that are controlled by Caltrans, the improvement would need to be reviewed and planned by Caltrans and might take a long process to implement. Hence, the improvements might not get built or at least not built for a number of years. This fact affects the traffic analysis and further reinforces the need for the project to be linked to the construction of improvements.

### **Assessment 28:**

Page 78, Improvement at the SR-14 Northbound Ramps / Placerita Canyon Road Intersection: Is this recommended improvement also coordinated with Caltrans? At intersections that are controlled by Caltrans, the improvement would need to be reviewed and planned by Caltrans and might take a long process to implement. Hence, the improvements might not get built or at least not built for a number of years.

### **Assessment 29:**

Emergency Access & Evacuation: All project access appears to be via the east property side on and around 12<sup>th</sup> Street or 13<sup>th</sup> Street. Considering the large number of persons expected on the site and the size of the site, a secondary/emergency access located on the west side of the site is appropriate. Otherwise, if there is an issue at 12<sup>th</sup> Street or 13<sup>th</sup> Street on the east side of the site, there are no other evacuation routes for the site. Emergency evacuation routes need to be analyzed and provided.

If the site had 2,468 parking spaces, there would be a large number of vehicles to evacuate from the site during an emergency condition.

Furthermore, the evacuation analysis appears to depend on and assume on the Dockweiler Drive extension to be in place. As previously noted in Assessment 22, the implementation of this extension depends on funding availability. There are no alternative evacuation plans posed particularly if the Dockweiler extension is not constructed or timely constructed.

### **Assessment 30:**

Figure 10, Project Trip Distribution: Some of the project traffic appears to be absorbed between study intersections, specifically traveling between intersections 7 and 8. There is no data or other evidence supporting this conclusion.

### **Assessment 31:**

Figure 10, Project Trip Distribution: The analysis appears to assume more of the project trips traveling through the City and local streets than traveling to and from the freeways, especially the I-5 Freeway which provides great regional access. Is this a valid assumption considering the workers are mostly coming from outside of Santa Clarita? What percentage of the workers are expected to live in the surrounding neighborhoods? How has this been calculated or what is the basis for this assumption? A greater percentage of trips might need to be assigned to the freeway ramps to more accurately assess project traffic. More traffic should be assigned to the I-5 Freeway than the SR-14 Freeway.



**Assessment 32:**

Page 156, Construction Traffic: A table is lacking showing the expected trip generation of the construction phase which has the highest number of trips. Also, since trucks occupy more space than passenger vehicles, it is recommended the truck trips be converted to passenger car equivalents (PCE) using a factor of 2.0. This will assist the user in understanding the number of trips generated by the project construction phase and compare to project operations.

**Shadowbox Studios Parking Analysis Form (Gibson Transportation Consulting, Inc., December 20, 2022) Review Assessments:**

**Assessment 33:**

Table 1, Parking Demand Calculations: The parking analysis appears to base the parking demand for the studio-related uses on light manufacturing use. No explanation was provided on why this use is appropriate. It is recommended the parking be based on study of similar sites and studios.

**Assessment 34:**

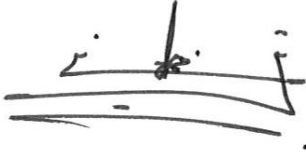
Parking Demand Calculations: The parking analysis appears to assume shared parking conditions for the proposed uses. Since the food service parking rate is reduced to only account for employee parking, is a shared parking between the food service uses and the rest of the uses applicable? What is the basis for this comparison?

Also, shared parking can result in longer parking turnover times. Hence, parking spaces can be expected to be occupied for a longer than usual time, affecting parking demand.

Furthermore, what is the source for the time of day parking demand of the studio uses?

MAT Engineering Inc. appreciates the opportunity to provide this review. If you have any questions, please contact us at 949-344-1828 or [at@matengineering.com](mailto:at@matengineering.com).

Respectfully submitted,  
MAT ENGINEERING, INC.



Alex Tabrizi, PE, TE  
President



**ALEX TABRIZI, PE, TE**

**President**



Alex Tabrizi, PE, TE is a licensed civil engineer and licensed traffic engineer in the State of California and serves as the founding president of MAT Engineering, Inc. Mr. Tabrizi has worked professionally in the field traffic engineering and transportation planning/engineering since 2003. He received his bachelors of science degree in civil engineering with an emphasis on structural engineering from the University of California, Irvine.

Mr. Tabrizi has extensive experience in providing transportation planning and engineering consulting services and expertise to a wide range of clients including private sector, land developers, public agencies, various districts of California Department of Transportation (Caltrans), and local governments. Mr. Tabrizi has completed and supervised preparation of hundreds of complex transportation planning and parking demand/utilization studies with successful track record in providing innovative, cost-effective and practical technical consulting services and solutions for politically sensitive, complex, and unique projects involving numerous stakeholders and requiring to meet accelerated project schedules.

As an Expert consultant to the California Board for Professional Engineers, Land Surveyors, and Geologists, Mr. Tabrizi assists the Board with development, maintenance, and validation of material for the Board's professional licensing examinations.

Mr. Tabrizi is also a member of the Traffic Engineering Occupational Analysis Task Force assisting the State's Board of Engineers in determining descriptive information about the tasks performed by Traffic Engineers in the industry and the knowledge standards required to adequately perform those tasks.

Mr. Tabrizi has performed transportation planning studies dealing with various stages of project development, such as signal warrant analysis, circulation analysis, full traffic impact analysis, roundabout analysis and parking studies. He has prepared traffic flow visual simulations combining measured vehicular and pedestrian volumes with aerial imagery to show existing and future traffic circulation for public understanding and discussion. Mr. Tabrizi has also completed a number of transportation engineering and roadway design projects ranging from preparing preliminary studies and reports such as Caltrans Project Reports (PR) and City street improvement concepts to final construction plans, specifications, and cost estimates for Caltrans highway improvement projects.

Mr. Tabrizi is knowledgeable in computer applications for transportation engineering and planning, including, AutoCAD, Microstation with InRoads, Traffix, HCS, Synchro/ SimTraffic, and aaSIDRA.

**Registration:**

2011, Civil Engineer, CA, 78923

2014, Traffic Engineer, CA 2722

**Years of Experience:** 18

**Education:**

B.S., 2005, Civil Engineering, University of California, Irvine

**Certifications:**

ASCE, On-Site Circulation Design

ITE, Intersection Safety and Geometric Design - Sight Distance

SIDRA, Roundabout Analysis

**Professional History:**

MAT Engineering, Inc. – President, Present

California Board for Professional Engineers, Land Surveyors & Geologists - Expert Consultant & Traffic Engineering Occupational Task Force Member, 2016-Present

RK Engineering Group, Inc. – Principal, 2014-2022

RBF Consulting – Associate, 2005-2014

Urban Crossroads, Inc. - Engineering Aide, 2003-2005



**Areas of Expertise:**

Transportation Planning & Engineering  
Traffic Impact Analysis  
Vehicle Miles Traveled (VMT) Analysis  
Engineering & Traffic Survey (ET&S) Studies (Establishing Speed Limits)  
Traffic Engineering  
Transportation Demand Management Plans & Strategies  
Due Diligence Studies  
Traffic Signal Timing & Progression Analysis  
Site Access, Wayfinding & Circulation System Design & Review  
Project & Infrastructure Phasing  
Roundabout Analysis  
Traffic Control Device Warrants  
Traffic Calming & Traffic Safety Studies  
Parking Demand Studies & Parking Lot Design

**Relevant Experience:**

- City of Aliso Viejo On-Call Services (Aliso Viejo, CA)
- City of Costa Mesa On-Call Services (Costa Mesa, CA)
- City of Perris On-Call Services (Perris, CA)
- Redlands City-Wide Engineering & Traffic Survey (ET&S)
- Corona de Mar / Coast Highway Bypass Traffic Review (Newport Beach, CA)
- Dover Shores & Mariners Traffic Review (Newport Beach, CA)
- Marymount College Facilities Expansion EIR (Rancho Palos Verdes, CA)
- Murrieta Hills Residential & Commercial Specific Plan (Murrieta, CA)
- Ridgeline Apartments (San Bernardino, CA)
- TTM 15731 (Highland, CA)
- TTM 19992 (Rancho Cucamonga, CA)
- Oxnard Village SP (Oxnard, CA)
- Lost Canyons Residential & Golf Club (Simi Valley, CA)
- Vantis Live/Work & Apartments (Aliso Viejo, CA)
- Palmdale TOD Transit Village (Palmdale, CA)
- Fox Plaza Mixed Use Traffic & Parking Analysis (Riverside, CA)

**Relevant Experience (Continued):**

- Lambert Ranch Traffic Impact Analysis (Irvine, CA)
- 301 East Jeanette Lane Residential Project (Santa Ana, CA)
- Metro Goldwyn Mayer (MGM) Office Building (Beverly Hills, CA)
- Moorpark Studios West - Largest Independent Movie Studios in the US (Moorpark, CA)
- City of La Habra City-Wide Engineering & Traffic Survey
- City of Upland City-Wide Engineering & Traffic Survey
- City of Upland City-Wide Traffic Signal & Equipment Review
- Indian Wells Tennis Garden Stadium (Indian Wells, CA)
- Casino San Pablo Traffic Analysis (San Pablo, CA)
- Glendale Galleria Traffic & Parking Support (Glendale, CA)
- Galleria at Tyler Expansion Project (Riverside, CA)
- The Shops at Tanforan Site Circulation & Wayfinding (San Bruno, CA)
- The Boulevards at South Bay On-Site Circulation (Carson, CA)
- Hilton Garden Inn Hotel (Irvine, CA)
- Raytheon South Campus Specific Plan (El Segundo, CA)
- In-N-Out Restaurant (El Segundo, CA)
- Porsche Experience Center (Carson, CA)
- Downtown Summer Festival Parking Management Plan (Laguna Beach, CA)
- Trabuco Road Corridor Analysis (Irvine, CA)
- University Drive Street Improvements (Irvine, CA)
- Main Street Downtown Merge Relocation & Street Improvements (Fort Bragg, CA)
- Perris Bicycle & Trail Master Plan (Perris, CA)
- Campus Pointe / Chestnut Avenue Roundabout Analysis (Fresno, CA)
- Walmart (Rialto, CA)
- State Route 1 / Marina Highway Roundabout Analysis (Marina, CA)
- State Route 217 / Hollister Avenue Interchange Roundabout Analysis (Goleta, CA)
- City of Brawley Non-Motorized Transportation Plan (Brawley, CA)
- Alessandro Boulevard Corridor Implementation Project Traffic Analysis (Moreno Valley, CA)
- State Route 57 Northbound Widening Traffic Analysis (Caltrans District 12)
- Mater Dei High School Expansion (Santa Ana, CA)



**Relevant Experience (Continued):**

- Interstate 15 / State Route 79 South Interchange Improvement Design Project (Riverside County, CA)
- Interstate 5 HOV Lane Extension Project (Caltrans)
- La Pata Avenue Gap Closure & Camino Del Rio Extension Project (Orange County, CA)
- Bloomington Phase 1 Traffic Impact Analysis (County of San Bernardino, CA)
- Bell Business Center Traffic Impact Analysis (Bell, CA)



**Resolute Associates LLC**  
FROM VISION TO ACTION

May 20, 2023

Erika Iverson, Senior Planner  
City of Santa Clarita Planning Division  
23920 Valencia Boulevard, Suite 302  
Santa Clarita, CA 91355

**Subject:** Response to NOA for Shadowbox Studios Project Draft EIR

Dear Ms. Iverson,

Thank you for the opportunity to comment on the Draft EIR for the proposed Shadowbox Studios project.

### **Introduction**

The focus of my limited review of the Draft EIR is on fire safety and the impacts of a wildfire burning in the Wildland Urban Interface (WUI) that could threaten the Shadowbox Studios project (Project). Most importantly, I focused on the impacts the project will have on exasperating the wildland fire threat to the neighboring communities, specifically Placerita Canyon and Circle J neighborhoods.

The Placerita Canyon and Circle J communities were developed prior to the rigorous WUI fire codes that are now in place and will be required of this Project. The most significant impact to the communities is the Project's compounding threat to these already inadequate evacuation routes and the extreme threat from wildfire which continues to get worse. These communities have limited egress during an evacuation, there are long dead-end roads, and the structures are not built with hardening to prevent flame impingement and ember intrusion.

In section 4.8 Hazards and Hazardous Materials, the EIR asks; *Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?* And then determines that the impacts to be less than significant and therefore, no mitigations measures are required. I believe that this determination requires further analysis of the Project's neighboring communities of Placerita Canyon and Circle J. Upon further analysis, I am confident it will be determined that the impact on the community will be significant and will require mitigations including requiring the Dockweiler Extension be completed as part of the first phase of the project. Additionally, further analysis should be done to identify possible road interconnections that will reduce the long evacuation time and reduce the dead-end road situation within the communities.

As part of the review, I am including a fire behavior analysis completed by Tim Chavez who is a fully qualified Fire Behavior Analyst with decades of experience modeling fire behavior on California wildfires. His study further corroborates, along with the fire behavior analysis contained in the EIR, the significant threat that wildfires pose to the neighborhoods adjoining this project. His report is attached to this letter.

### **Historical Fires**

The Santa Clarita area is recognized by California's seasoned wildland fire commanders as an area for large, destructive and deadly fires. Historically, wildland fires most often occur in the

same areas over and over. One can look back at history and see countless major fires that have burned in and around the Santa Clarita Valley. Listed are some of the significant fires that have occurred since 1960.<sup>1</sup>

- New Hall Fire 1962 – 8,583 acres, 15 structures destroyed
- Clampitt Fire 1970 -115,537 acres, 86 homes destroyed, 4 fatalities
- Agua Dulce Fire 1970 – 21,756 acres
- Sayre Fire 2008 – 11,221 acres, 604 structures destroyed
- Buckweed Fire 2007 – 37,804 acres, 63 structures destroyed
- Ranch Fire 2007 – 41,523 acres, 10 structures destroyed
- Sand Fire 2016 - 41,432 acres, 18 homes destroyed, 2 fatalities
- Rye Fire 2017– 6,049 acres, 6 structures destroyed

The EIR identifies that the average interval between wildfires within 5 miles of the project site is less than 1 year. This is a very high fire frequency rate.

The fire history, as corroborated by the EIR, clearly indicates that destructive wildfires will continue to threaten the Project area and the neighboring communities of Placerita Canyon and Circle J.



*Based on an analysis of the fire history data set, specifically, the years in which the fires burned, the average interval between wildfires within 5 miles of the Project site was calculated to be less than 1 year with intervals ranging between 0 (multiple fires in the same year) to 8 years. Based on the analysis, it is expected that there will be wildland fires within 5 miles of the Project site at least every 8 years and on average, every year, as observed in the fire history record. Based on fire history, wildfire risk for the Project site is associated primarily with a Santa Ana wind-driven wildfire burning or spotting on-site from the north or east, although a fire approaching from the south during more typical on-shore weather patterns is possible. The proximity of the Project to large expanses of open space to the east (Quigley Canyon Open Space) and southeast (Placerita Canyon), has the potential to funnel Santa Ana winds, thereby increasing local wind speeds and increasing wildfire hazard in the Project vicinity. – Appendix N, page 18*

<sup>1</sup> <http://www.laalamanac.com/fire/fi07.php> & <https://firemap.sdsc.edu/>







Fire History from 1960 to 2023





1962 the Newhall Fire articles:

<https://scvhistory.com/scvhistory/lw2989.htm>

<https://scvhistory.com/scvhistory/ap0837.htm>

### Fire Behavior Analysis

On page 41 in Appendix N the fire behavior analysis is focused on the impacts of a wildfire on the Project site and not on the neighboring communities. Therefore, inference must be applied to understand the impacts a wildfire will have on the neighboring communities and then a determination on what impact a wildfire will have. This is important and must be considered to determine what improvements this project should include that will mitigate what should be significant impacts on the neighboring community.

As the EIR correctly states this project is located and is surrounded by areas designated Very High Fire Hazard Severity Zone (VHFHSZ) by the State of California. This means that the wildland fire environment factors include steep and broken topography, volatile vegetation, and frequent weather conditions conducive to extreme fire behavior.

Further, the fire behavior analysis included in the EIR in Appendix N **does** accurately corroborate that extreme wildland fire behavior, usually under Santa Ana wind conditions, frequently occurs in the area around the Project. Because of these conditions the project is required to be built under the strict Wildland Urban

## Melody Ranch - Newhall Fire

August 28, 1962 — Gene Autry's Melody Ranch movie town burns to the ground as flames engulf most of the hills surrounding the Santa Clarita Valley.

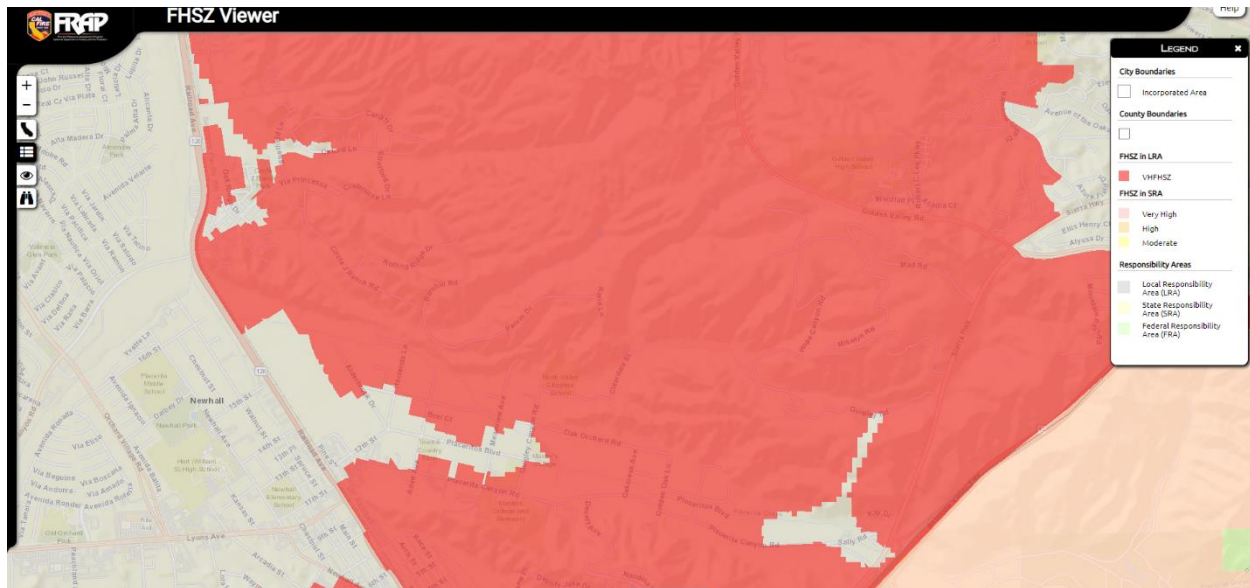
The first blaze broke out just after noon in Hasley Canyon, north of Castaic Junction. The second broke out an hour later near the Circle J Ranch between Newhall and Saugus. High winds whipped the flames into the most intense inferno anyone had ever seen.

When the smoke cleared three days later, 17,200 acres had been scorched and 15 structures and numerous out-buildings were lost. No one was killed, but the Western street at Melody Ranch was gone.

"I had always planned to erect a Western museum there," Autry remembered in 1995, "but priceless Indian relics and a collection of rare guns, including a set used by Billy the Kid, went up in smoke. Thank God, the ranch hands and all 14 of our horses were uninjured."



Interface fire regulations required by the City of Santa Clarita and the State of California. Unfortunately, that same extreme fire behavior identified by the analysis also affects the neighboring communities in the same manner, except the residents of these older communities, having been developed decades ago, do not have the benefit of the current fire regulations for new developments and construction to protect them.



*State of California Fire Hazard Severity Zone Map of the Project Area*

Further evidence of the extreme fire behavior is included in the Fire Behavior Analysis attached to this letter completed by Fire Behavior Analyst Tim Chavez. He identifies that the fire rate of spread can be up to 5 mph and spot fires from burning firebrands can be expected to be prolific and frequent, regularly reaching 1500' ahead of the fire front, further increasing the fires rate of spread downwind. These are extreme fire behavior conditions that can be deadly.

With this Project, a fire threatening these communities will now be further impacted during an evacuation with the additional 2,400 employees that will increase traffic without requiring mitigations prior to construction.

### **Evacuation**

While the EIR correctly demonstrates that the evacuation of the Project site itself will be adequately addressed, it also demonstrates the unacceptable inadequacy of a rapid evacuation of the neighboring communities, requiring 2.6 hours to fully evacuate. This is compounded by extreme fire behavior conditions that can spread a fire at 4.7 mph.

The EIR contains a comprehensive evacuation study by Gibson Transportation Consulting. The study correctly includes not just the evacuation of the Project, it also includes the evacuation of the "evacuation shed" bounded by the area south of Parvin Drive on the north, Quigley Canyon Road and Melody Movie Ranch on the east, the Master's University campus and Placerita Canyon Road on the south, and Railroad Avenue on the west.

It could be argued that the evacuation shed should include the neighborhood all the way to the Sierra Highway as that area also requires two means of egress, thus sending those residents west on Placerita Canyon Rd.



The methodology utilized in the Wildfire Section 4.17 states that, “*The analysis also considered the modifications to the Dockweiler Drive Extension Project...*” It is clear from the traffic study that evacuation times are cut in half for the Project’s neighboring communities **only if** the Dockweiler Drive extension is completed. Yet throughout the EIR it is always referred to as a “future project.”

The mitigation identified by the Evacuation Traffic Study, **but not included as a requirement** of this Project is the Dockweiler Drive extension or corridor. As stated, it is identified as a **future**

*Traffic Study Conclusion – page 5*

*As shown in Figure 6, the improved Dockweiler Corridor would facilitate the evacuation of the Placerita Canyon Area by reducing the evacuation congestion period at Arch Street & 12th Street & Dockweiler Drive from 2.6 hours under Existing Conditions to 2.2 hours under Future with Project (Roundabout) Conditions and 1.5 hours under Future with Project (Traffic Signal) Conditions. Further, average travel times through the Dockweiler Corridor would be greatly reduced for vehicles evacuating the Placerita Canyon Area, from 27 minutes under Existing Conditions to under 18 minutes under Future with Project (Roundabout) Conditions and under 16 minutes in the Future with Project (Traffic Signal) Conditions. Thus, the traffic signal intersection design would provide for the most efficient traffic operations under an evacuation scenario.*

project. The Dockweiler Drive extension should be required as the first phase of this Project and completed before the impacts of the Project are realized.

Other mitigations that should be considered to improve emergency evacuation of the neighboring communities should be the identification of interconnection routes that might provide egress from a neighborhood to safety. This could include connecting the Circle J neighborhood to the Placerita Canyon neighborhood, thus reducing the existing long dead-end road situations.

### **Large Animal Evacuation**

There is no mention of large animal evacuation in the EIR, including in the evacuation traffic study. It is well understood that evacuation of horses and other large animals takes time, specialized equipment and training. Large animal evacuation teams coming in during an evacuation with trailers and the time and congestion caused from loading up and transporting horse trailers all will be an impact. It is also understood that many people faced with immediate evacuation will delay or refuse to evacuate if they are unable to evacuate their pets, including horses and other animals. The Project’s neighboring communities are locations where many people have horses and other livestock. It would be prudent to include in the evacuation traffic study the impacts of large animal evacuation.



*Sand Fire horse evacuation - photo by Sydney Croasmun*



## Emergency Access

*Transportation Section 4.14, page 20 Threshold 4.14(d) Would the Project result in inadequate emergency access?*

Emergency access or ingress is the ability for first responders to be able to access a site and a neighborhood. The L.A. County Fire target response times are 8 minutes for suburban areas. This is currently achievable to the communities during normal travel conditions and validated by the traffic study. The evacuation traffic study does recognize that access to the area would be prohibited during an emergency evacuation conditions. The important question to ask **is not**

*The Existing Conditions volumes utilize the existing afternoon peak hour volumes for north-south traffic on Railroad Avenue and assume that, under emergency evacuation conditions, the traffic on Railroad Avenue and Dockweiler Drive would be prohibited from entering the area. - page 3 transportation study*

included in this study, *during an evacuation of the Placerita Canyon and Circle J communities will the fire department be able to make access into the communities as people are fleeing from an emergency? Further, is that situation further impacted by this Project?*

## Pre-Construction

The fire code requires that prior to construction a project must complete fire access. Further L.A. County Fire recommends in the EIR *that prior to bringing lumber or combustible materials onto the project site, improvements within the active development area shall be in place, including utilities, operable fire hydrants, an approved, temporary roadway surface, and fuel modification zones established.*

While the code applies to new construction, specifically this Project, it demonstrates the importance of fire department access before construction when combustible materials are underway.

A nexus should be made that while the roads in the surrounding communities are established, they have long been viewed as inadequate compared to if they had been built to modern fire safety regulations.

This will be further exasperated by the significant addition of the 2,400 employees of the Shadow Studio who will further add to emergency evacuation impacts to the egress routes during an emergency. Therefore, it would be an important mitigation that prior to construction of the Project, installation of the Dockweiler Extension be completed to significantly improve the evacuation rate of the neighboring communities.

### Fire Code Chapter 501.4 Timing of Installation

Where fire apparatus access roads or a water supply for fire protection are required to be installed, such protection shall be installed and made serviceable prior to and during the time of construction except where approved alternative methods of protection are provided. Temporary street signs shall be installed at each street intersection where construction of new roadways allows passage by vehicles in accordance with Section 505.2.

## Round-About

The evacuation traffic study determined that a signaled intersection at the future intersection of Dockweiler Drive and 12<sup>th</sup> Street would improve evacuation times for the average vehicle evacuating from 22 minutes to 16 minutes for a signaled intersection and to 18 minutes for a



roundabout. Therefore, it suggests that a signaled intersection is superior to a roundabout. While the models may indicate this, anecdotal evidence suggests that during an evacuation a signaled intersection that is not controlled by a traffic officer may well cause a logjam as vehicles wait for the signal to change allowing them to exit the dangerous evacuation area. A roundabout will provide for a continued flow of vehicles from all exits. It is suggested that this concern be further reviewed.

## Conclusion

This Project will impact the ability for both the neighboring communities to quickly evacuate as well as simultaneously allow emergency responder ingress into the neighborhoods. Our analysis is that without the Dockweiler Drive extension installed as part of the first phase, the Project's impact on the communities is significant and the EIR should reflect that.

The report says a fire can spread 4.7 mph and that the Placerita Canyon residents will average 27 minutes to evacuate (however, it did not indicate what location they are evacuating to). If we consider a travel distance of 1 mile to evacuate by vehicle, this is about 2 mph. The Dockweiler Drive extension will reduce the evacuation time to 16 minutes or about 4 mph, and improvement of the average evacuation time by a vehicle to twice as fast, still not as fast as the potential spread of a Santa Ana driven wildfire, but a significant improvement and could clearly improve survivability during an evacuation. Are there other emergency egress routes that could also improve survivability during a fast moving wildfire?

The following thresholds have all been "determined to be less than significant without mitigation:"

- *Threshold 4.8(f): Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*
- *Threshold 4.8(g): Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*
- *Threshold 4.14(d): Would the Project result in inadequate emergency access?*
- *Threshold 4.17(a): Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?*
- *Threshold 4.17(b): Would the Project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*
- *Threshold 4.17(c): Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

These thresholds all rely on the Dockweiler Drive extension being part of the Project, yet it only is included as part of the Project as a future improvement. This is confusing as to when it will be in place. My analysis indicates that the Dockweiler Drive extension must be completed prior to the construction of the Project, otherwise some, or all, of the thresholds listed above are impacted by the Project and must require mitigation.



As part of the evacuation traffic study, we recommend that if it was not considered, that large animals be included as part of the study's modeling.

We also recommend a review of the determination of whether the Dockweiler Drive and 12<sup>th</sup> Street intersection could be more effective as a roundabout instead of a signaled intersection.

For information about my background, please go to our website at <https://resoluteassoc.com/associates>

Please do not hesitate to contact me.

Sincerely,



Robert Lewin  
Principal  
Resolute Associates, LLC  
[RobertLewin@ResoluteAssoc.com](mailto:RobertLewin@ResoluteAssoc.com)  
(805) 801-3569

**Attachment:** Shadowbox Fire Behavior Analysis by Tim Chavez

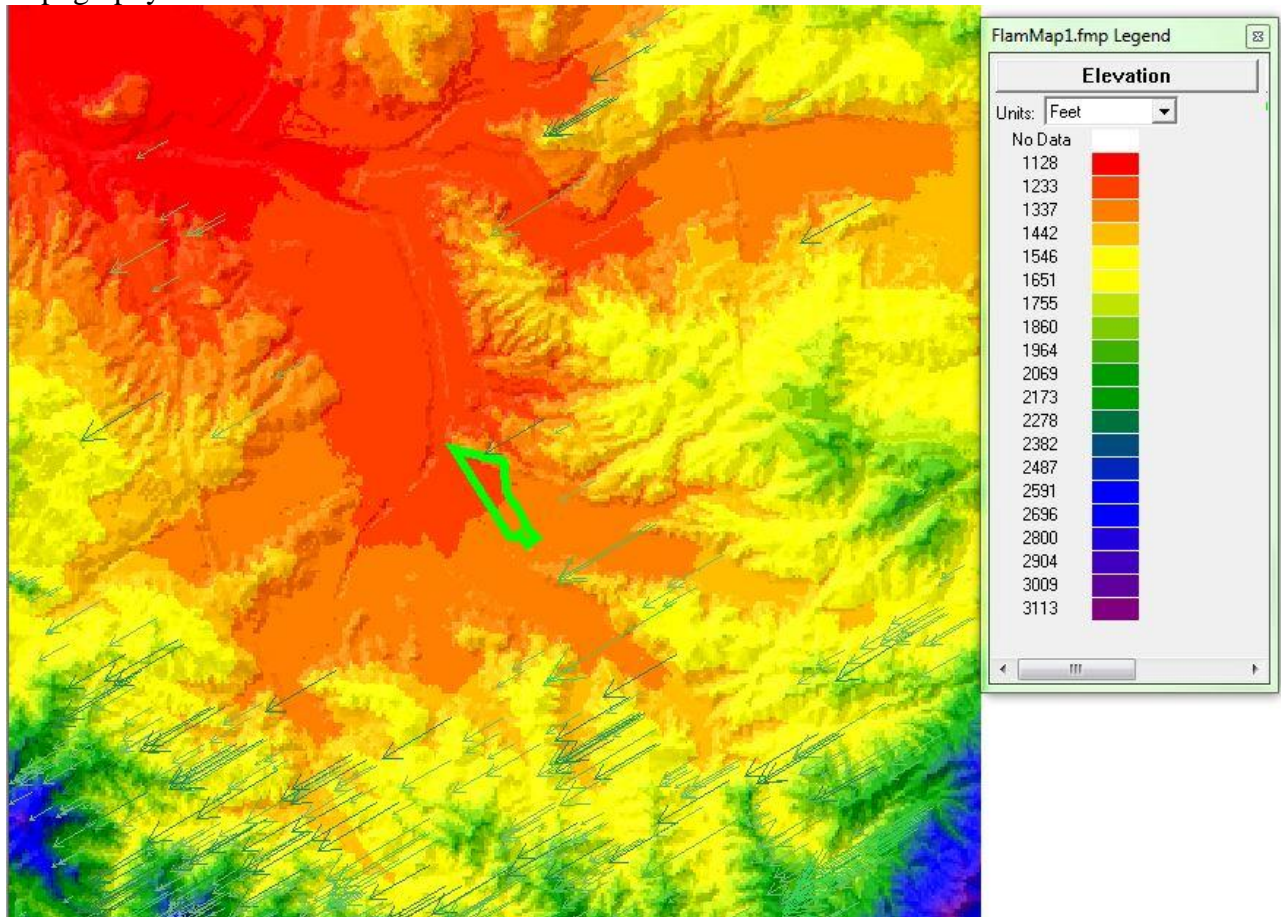


# Shadowbox Fire Behavior Analysis

Prepared by Tim Chavez, Fire Behavior Analyst  
May 20, 2023

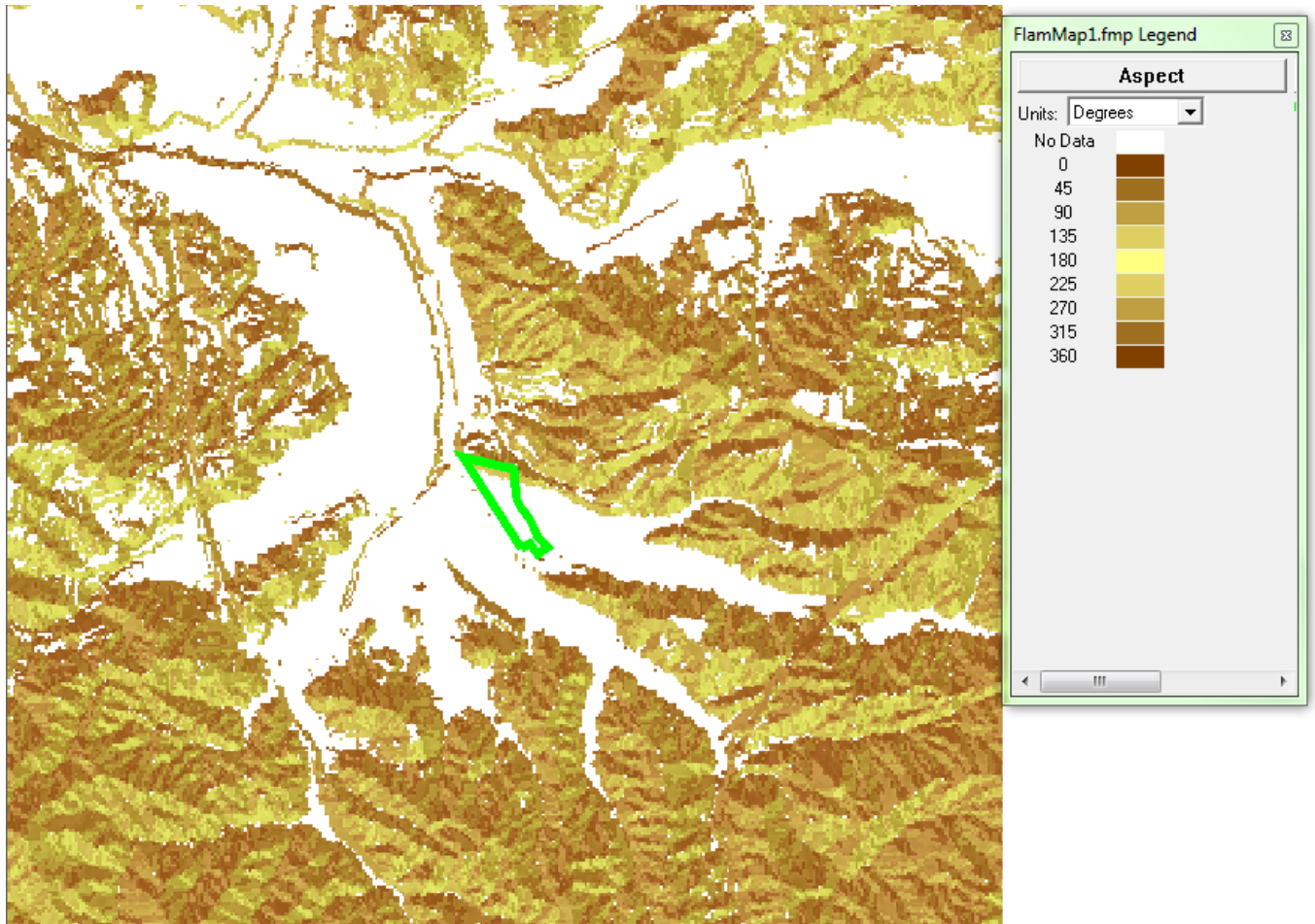
The Saugus-Newhall area of Southern California has unique and severe fire behavior conditions. Winds are strong almost every afternoon, and north winds along the I-5 corridor often occur in the spring and fall. Exceptionally strong Santa Ana winds occur in the fall and winter out of the north and northeast that can produce gusts stronger than 50 mph at times.

## Topography



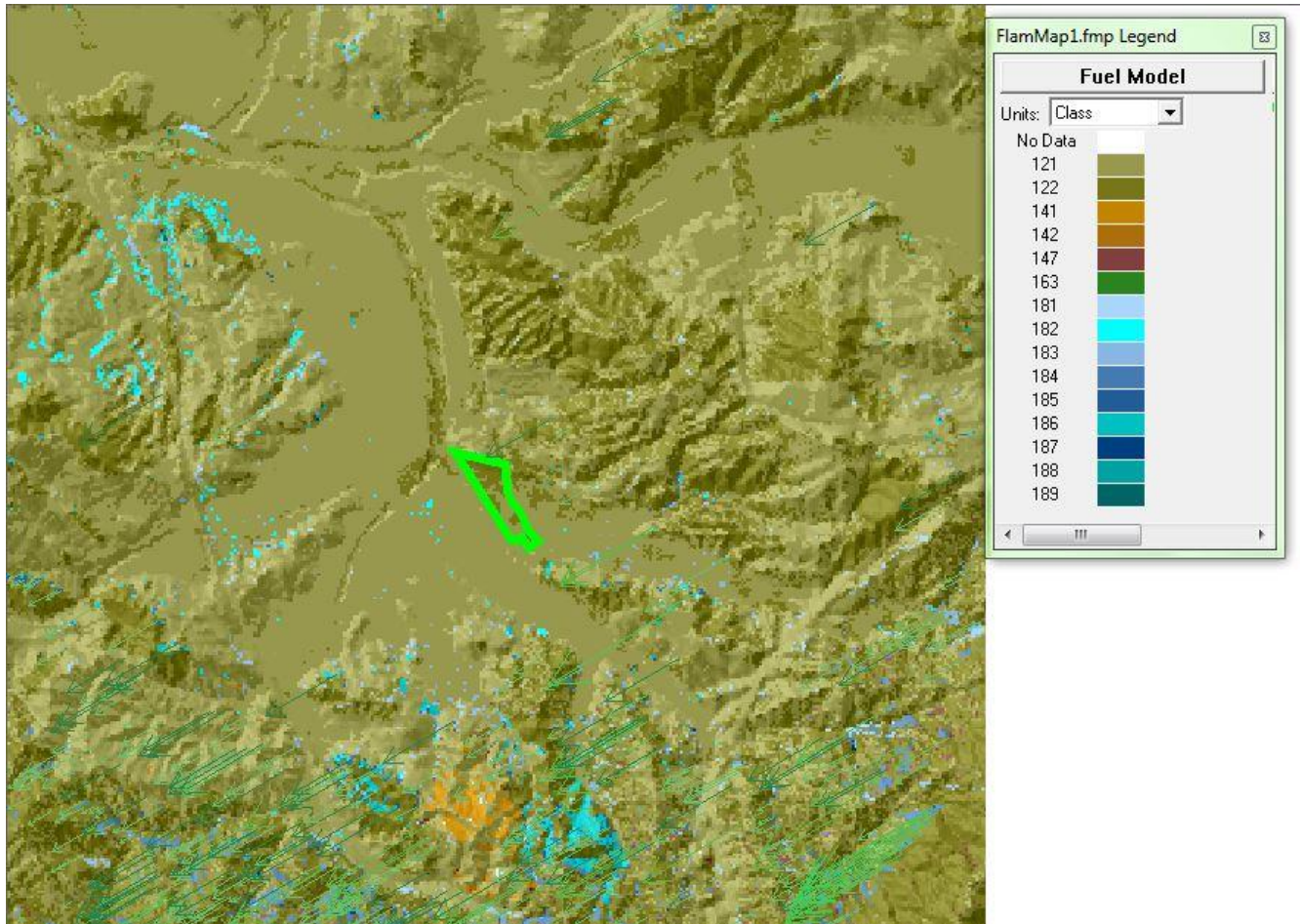
The terrain is heavily dissected with deep and steep canyons that are often oriented with the wind to produce spectacular rapid and intense fire spread.





Aspect or the orientation of slopes in the area are predominantly facing northeast (45) or southwest (225).

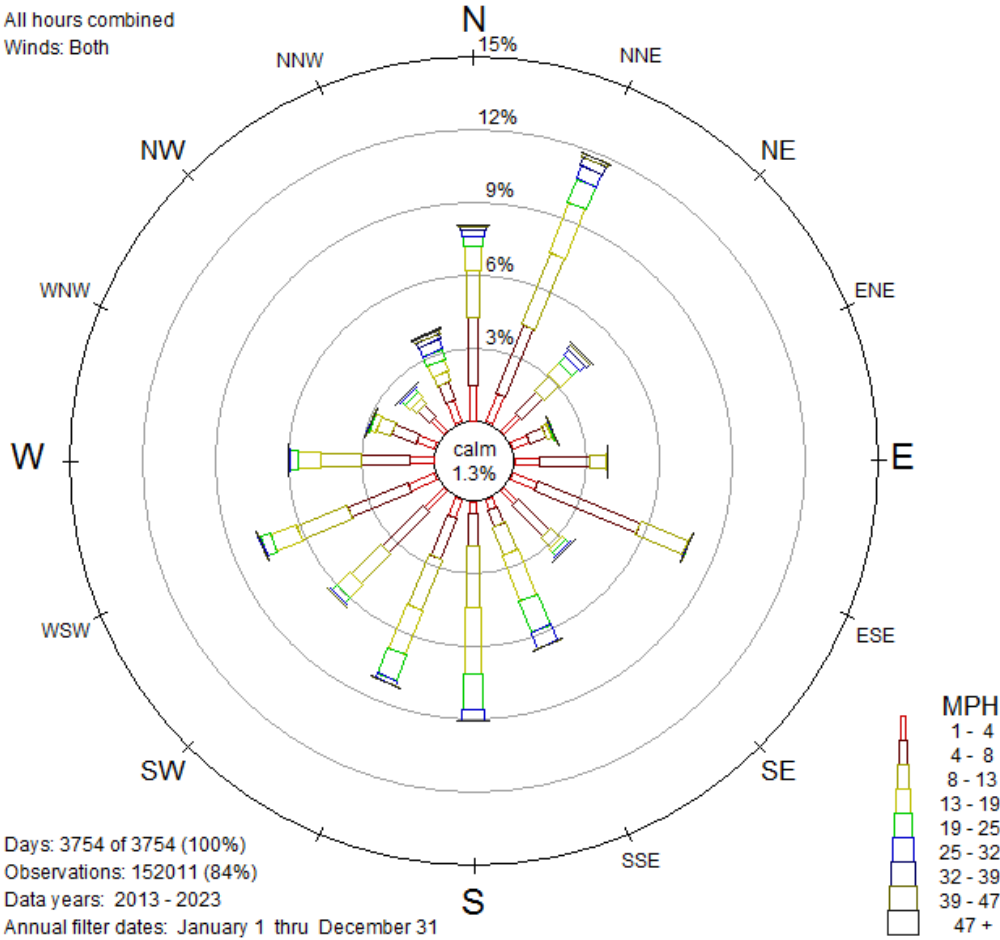




Fuels in the area of the project are dominated by coastal sage scrub 2-4' in height, indicated in the map above as 121 or 122. Some oak woodland and heavier brush are minor components in the area. (Fuel Model numbers are from Scoot and Burgan 2005).

An analysis of the wind direction and speeds from 10 years of data at the Saugus Remote Automatic Weather Station presented as a wind rose shows the strongest winds are from the north-northeast at greater than 47 mph at times.

Station: 045412 SAUGUS  
 All hours combined  
 Winds: Both

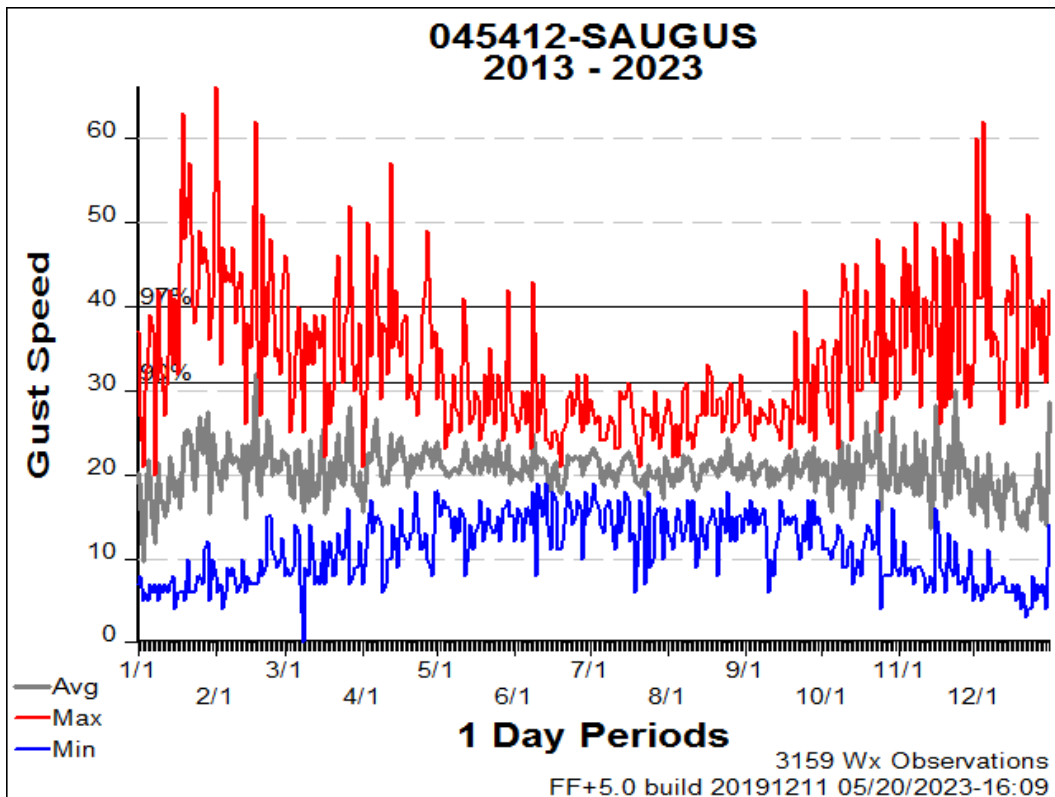
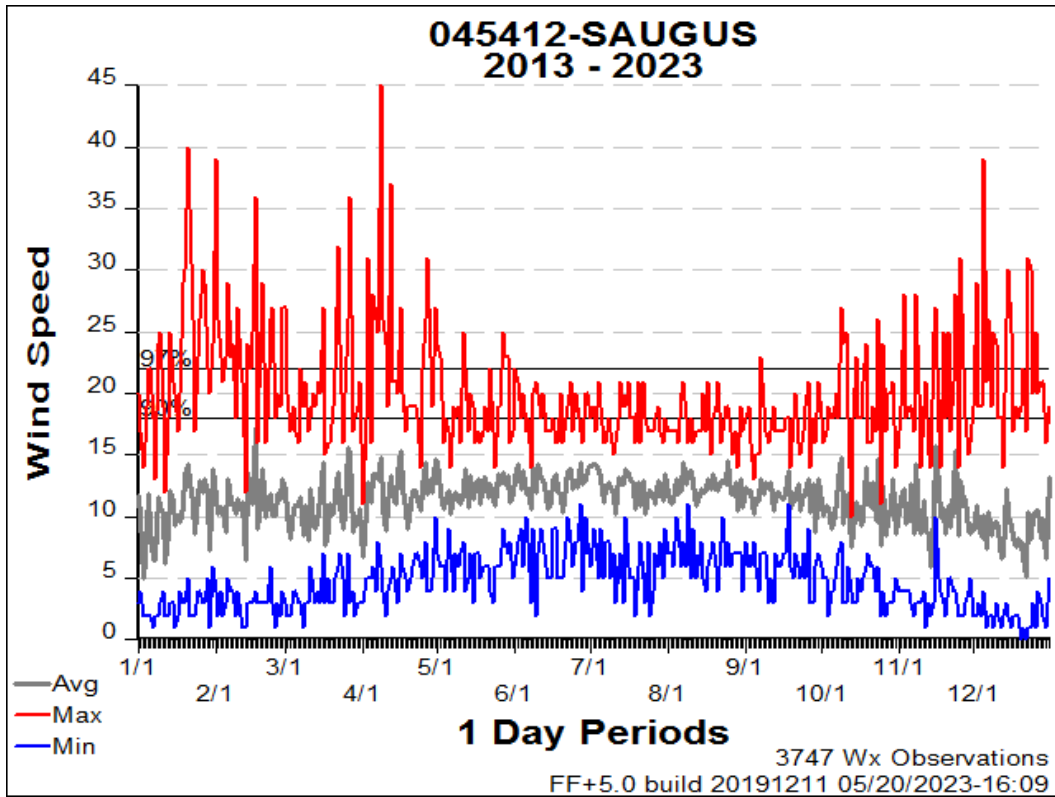


Days: 3754 of 3754 (100%)  
 Observations: 152011 (84%)  
 Data years: 2013 - 2023  
 Annual filter dates: January 1 thru December 31

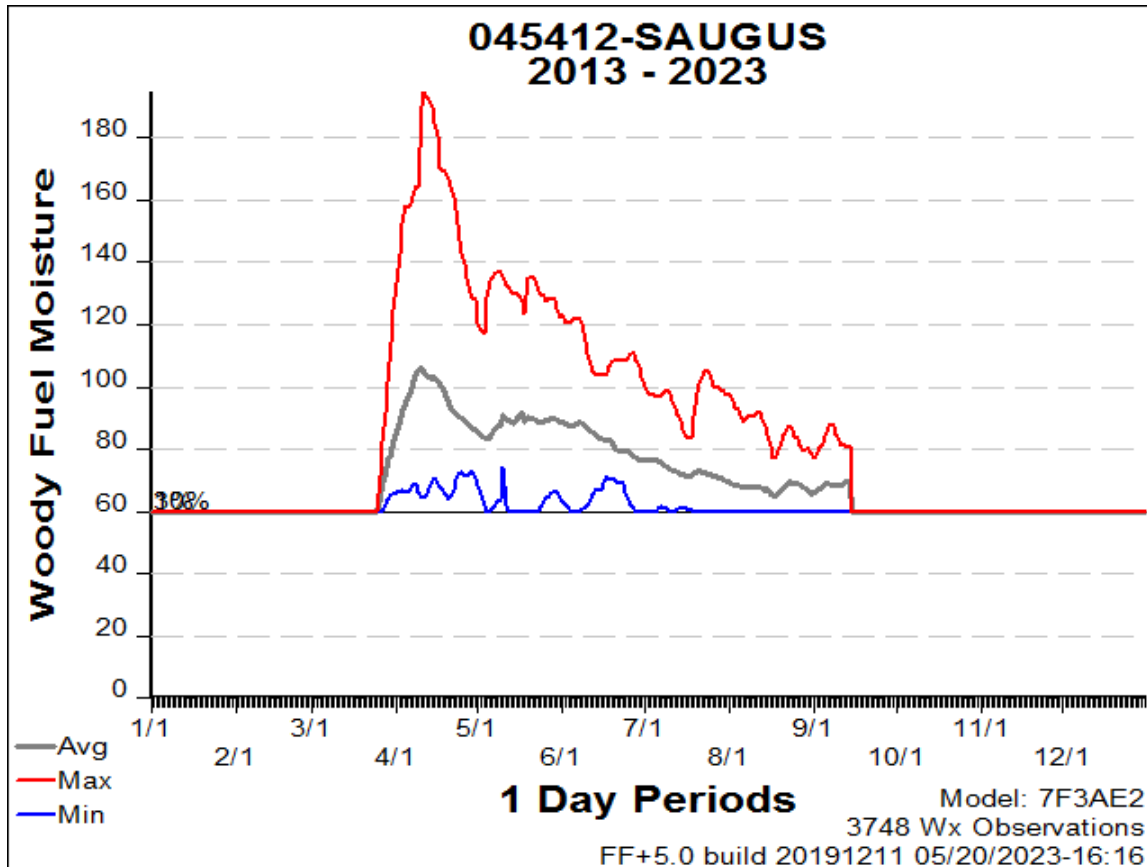
Wind speeds and gusts can also be represented over the year from this data:

Saugus RAWS information:

Station	NFDRS #	Owner	Forecast Zone	Lat/Lon Elev
SAUGUS	45412	L Gov	LAC	505 34.425000 -118.0086111 1450



As shown in the time series graphics, the strongest winds, above the 90th percentile, occur from late September until April. The period from September until December is of greatest concern in terms of fire behavior because the live fuel moistures from the chaparral fuels are also at their lowest points. Grasses are also fully cured and are 100% available fuel. The combination of the two conditions leads to often explosive fire behavior.



Therefore the scenario of most concern is a late season wind driven fire originating from north and/or east of the Shadowbox location.

Geospatial fire behavior analysis of the resultant fire behavior in the area of the Shadowbox location is shown below.

Worst case scenario conditions:

- Live fuel moisture 60% in chaparral fuels
- Grasses fully cured
- Dead fuel moisture fuel size 0-1/4"=3%,
  - 1/4-1" =4%
  - 1-3"=5%

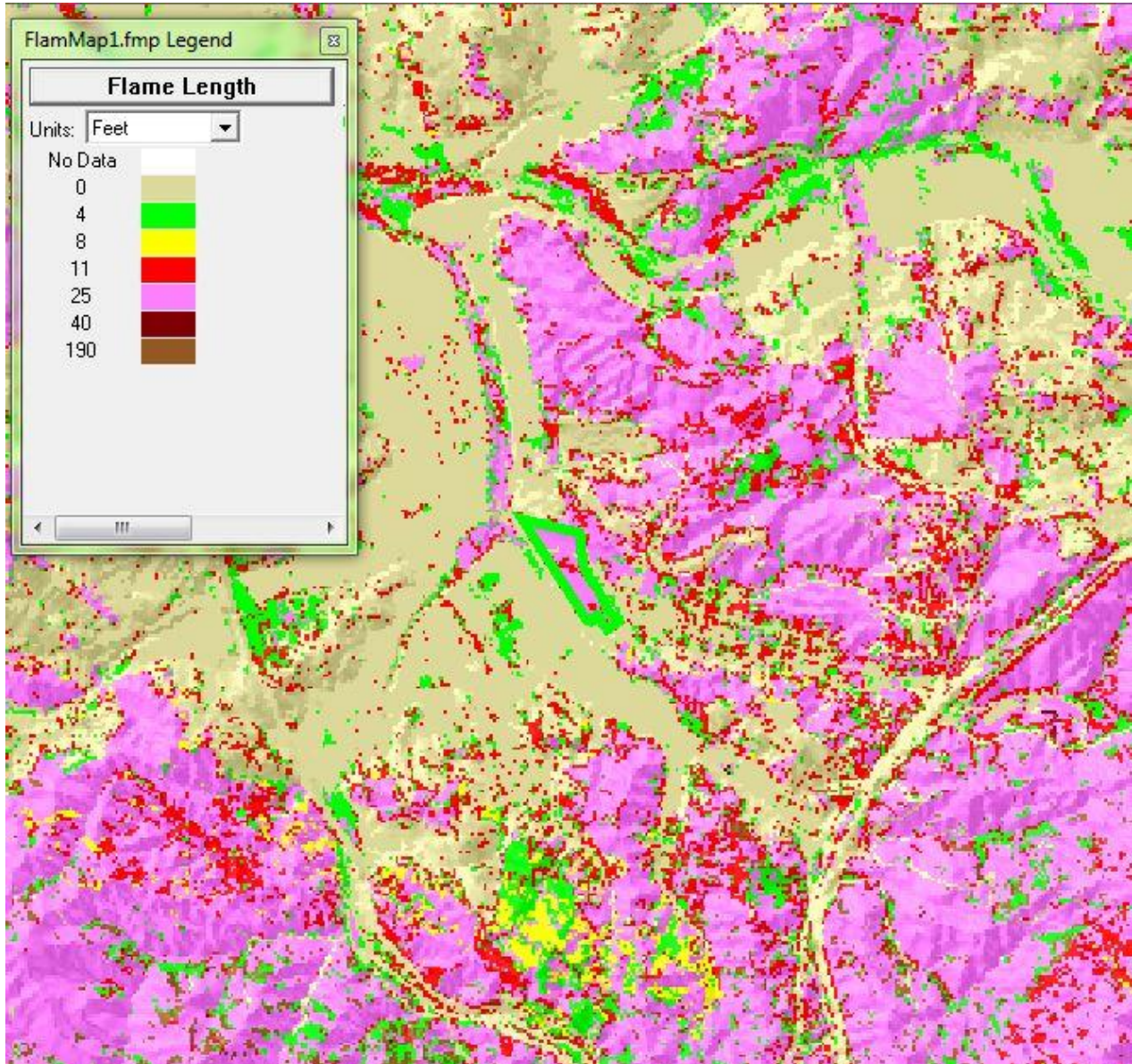
slope steepness varies by terrain

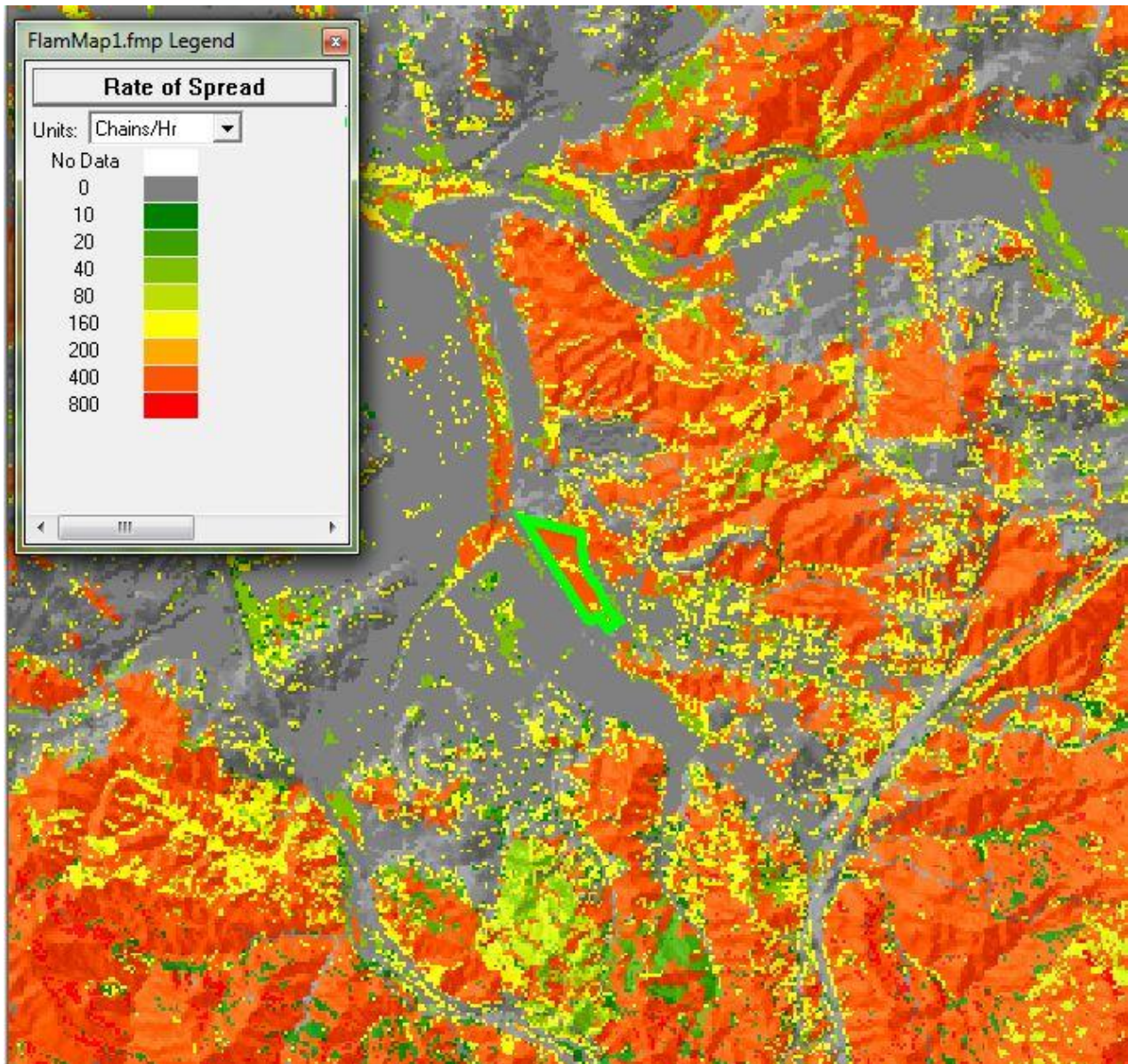
wind speed= gusting to 65 mph (recorded gust at Saugus on 12/5/2017)

DATE GSpd  
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02/01/2016	66.00
12/02/2016	60.00
02/17/2017	62.00
03/27/2017	52.00
12/05/2017	62.00
04/12/2018	57.00
01/21/2019	53.00
02/02/2019	55.00
12/07/2020	51.00
12/23/2020	51.00
01/19/2021	63.00

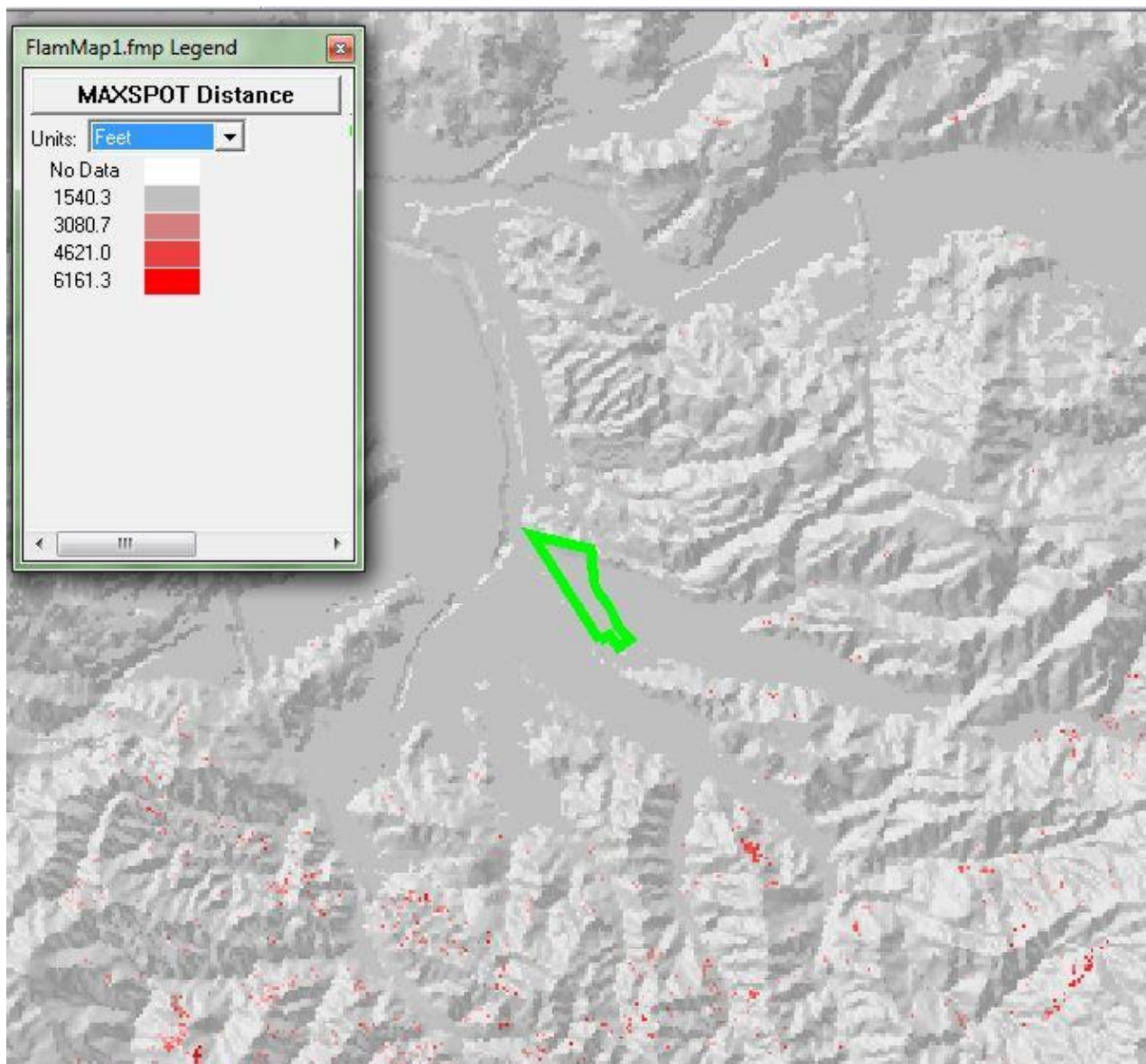




Flame lengths near 20-25' will emanate from the fuelbed directly to the north and east under any wind conditions greater than 25mph. As the fire approached the area, the rate of spread could be up to 200-400 chains/hour (2.5-5 mph). Warning time for evacuations would depend on early warning of an upwind fire start location and good location data of the fire front location (which is often lacking in the early stages of a fire).

Spot fires from burning firebrands can be expected to be prolific and frequent, regularly reaching 1500' ahead of the fire front, further increasing the fires rate of spread downwind.





### References

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# ROBERT LEWIN

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## EDUCATION

2013: *Executive Leadership Program*  
CENTER FOR HOMELAND DEFENSE & SECURITY  
NAVAL POST-GRADUATE SCHOOL  
Monterey, CA

1993: *Bachelor of Arts, Political Science*  
CALIFORNIA POLYTECHNIC STATE UNIVERSITY  
San Luis Obispo, CA

1983: *Associate of Science, Fire Science*  
ALLAN HANCOCK COLLEGE  
Santa Maria, CA

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## INCIDENT MANAGEMENT ROLES

Incident Commander, IMT 10  
Deputy Incident Commander, IMT 9  
Operations Section Chief, IMT 8  
Planning Section Chief, IMT 8 & 10

---

## CURRENT/FORMER AFFILIATIONS

Red Cross Board of Director Pacific Division  
International Assoc. of Emergency Mgrs.  
SLO & SBC Fire Safe Councils  
CAL Chiefs Association  
Southern CA Foresters & Fire Wardens  
EMSA Operations Committee  
Ambulance Performance Ops Committee  
Incident Management Team Committee  
SLO County Fire Chiefs Association

Experienced Fire Chief, Director and Consultant with a leadership and management style that supports and inspires excellence from others and promotes team solidarity. More than 15 years responding to disasters in leadership positions on Type 1 Incident Management Teams deployed up and down the State. Office of Emergency Management (OEM) Director with a demonstrated record of success managing large-scale projects and leading coordinated response efforts to complex disasters. Strategic thinker skilled at resolving problems, maintaining composure, and acting decisively and appropriately in crucial situations. Articulate, refined communicator with cooperative interpersonal skills and a high level of personal and professional integrity. Authored many articles and presented at numerous conferences.

---

## KEY QUALIFICATIONS

**Emergency Management:** Extensive experience leading emergency operations for major fires, natural and human caused disasters and complex special projects. A recognized leader in emergency planning and operations.

**Operations and Personnel Leadership:** Adept with strategic planning and executive leadership. Astutely assess and resolve operational challenges with staffing and service.

**Collaboration and Partnerships:** Approach all issues to determine how they can have a regional benefit and make improvements to multiple communities and agencies.

**Fiscal Management:** Adept with budget planning, allocation, and accountability.

---

## RECENT PROFESSIONAL EXPERIENCE

2019 - : *Principal*  
RESOLUTE ASSOCIATES LLC  
Providing emergency management and strategic planning consulting. Completed numerous pragmatic planning documents and the training to support their implementation.

2016 - 2019: *Director*  
SANTA BARBARA COUNTY  
OFFICE OF EMERGENCY MANAGEMENT | Santa Barbara, CA  
Managed all Emergency Operations Center activations, including 12 occurrences with continuous operations spanning December 2017 to April 2018 for fire/debris-flow disaster response.

2010 - 2015: *CAL FIRE / County Fire Chief*  
CAL FIRE | San Luis Obispo County (SLO), CA  
Lead a fire department with 21 fire stations, air tanker base, 12 inmate and CCC fire crews, dispatch center, training bureau, fleet management, fire prevention bureau.

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## KEY CERTIFICATIONS

Certified Emergency Manager (CEM) - IAEM  
Incident Commander  
Operations Section Chief  
Planning Section Chief  
Strike Team Leader  
Division Supervisor  
Emergency Command Center Operations  
Prescribed Fire Incident Commander

## SIGNIFICANT INCIDENT RESPONSES

*EOC Consultant*, Creek Fire  
*EOC Dep. Director*, Thomas Fire/Debris Flow  
*EOC Dep. Director*, Whittier Fire  
*EOC Dep. Director*, Winter Storm  
*EOC Operations Section*, Sherpa Fire  
*EOC Agency Administrator*, Butte Fire  
*Agency Administrator*, Cuesta Fire  
*Agency Administrator*, Springs Fire  
*EOC Agency Admin.*, Tsunami Warning  
*Incident Commander*, Guiberson Fire  
*Unified Incident Commander*, La Brea Fire  
*Incident Commander*, H1N1 CDPH support  
*Incident Commander*, Butte Lightning Comp.  
*Deputy Incident Commander*, Harris Fire  
*Deputy Incident Commander*, Angel Fire  
*Deputy Incident Commander*, Tar Fire  
*Deputy Incident Commander*, Zaca Fire  
*Operations Chief*, Esperanza Fire  
*Operations Chief*, Sawtooth Fire  
*Operations Chief*, Border #50 Fire  
*Plans Chief*, Eagle Fire  
*Plans Chief*, Old Highway Fire  
*Plans Chief*, Gaviota Fire  
*Incident Commander*, Guadalupe HAZMAT  
*Plans Chief*, Exotic New Castle Disease  
*EOC Fire Rep.*, San Simeon Earthquake  
*Branch Director*, Grandprix Fire, Fire Siege  
*Plans Chief*, Pechanga Fire  
*Plans Chief*, Monterey Floods  
*Situation Leader*, Northridge Earthquake

## ADDITIONAL CAL FIRE EXPERIENCE

2009 – 2010: *Deputy Chief, Operations* | SLO Co., CA  
2008 – 2009: *Division Chief, Operations* | SLO Co., CA  
2006 – 2008: *Pismo Beach Battalion Chief* | SLO Co., CA  
2001 – 2006: *Battalion Chief/Fire Marshal* | SLO Co., CA  
1998 – 2001: *Captain, Pre-Fire Engineer/GIS* | SLO Co., CA  
1995 – 1998: *Captain, Cuesta Conserv. Camp* | SLO Co., CA  
1992 – 1995: *Captain, Emergency Command* | SLO Co., CA  
1988 – 1992: *Captain, Airport Station* | SLO Co., CA  
1984 – 1988: *Fire Apparatus Engineer* | Riverside Co., CA  
1978 – 1984: *Firefighter* | SLO Co., CA

## PROFESSIONAL REFERENCES

### *Das Williams, Supervisor*

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### *Debbie Arnold, Supervisor*

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County Government Center, SLO, CA 93408  
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### *Eric Prater, Superintendent*

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### *Bruce Gibson, Supervisor*

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### *Garret Olson, CEO*

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### *Thom Porter, Director*

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*Resolute Client List and Contacts Available Upon Request*



**Resolute Associates LLC**  
FROM VISION TO ACTION