Re: Agenda Item 5 - Adopt a resolution adopting the Mitigated Negative Declaration for Master Case 13-184 (MC 13-184), and approve General Plan Amendment 13-003 to amend the General Plan Land Use Map, including "AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF SANTA CLARITA APPROVING ZONE AMENDMENT 13-005 AND ZONE CHANGE 13-007, AMENDING TITLES 11 AND 17 OF THE MUNICIPAL CODE AND THE ZONING MAP OF THE CITY OF SANTA CLARITA" and: "AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF SANTA CLARITA ADOPTING A DEVELOPMENT AGREEMENT WITH LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY (METRO) FOR THE REMOVAL OF 62 OFF-SITE ADVERTISING STRUCTURES, AND CONSTRUCTION AND OPERATION OF THREE DIGITAL BILLBOARDS ON CITY-OWNED PROPERTY ADJACENT TO THE INTERSTATE 5 AND STATE ROUTE 14 FREEWAYS."

Honorable Mayor and City Council:

While we applaud efforts to reduce over all bill board blight in the City, we do not believe that a proposal that substitutes unsightly and dangerously distracting electronic billboards along our freeways way system in areas that are now open space or important viewsheds, is the way to accomplish this. We also support the small business community in its concerns that advertising for local small businesses will now be out of reach both due to physical location of the signs and the huge financial investment needed to advertise, making billboard ads inaccessible for anyone accept large retailers. We therefore oppose this action and all associated permits and join with many in the business community in asking that this lease not be signed and no plan amendments be granted for use of open space to accommodate digital billboards for the following reasons.

Mitigated Negative Declaration is an Insufficient Document for a Plan Amendment that will remove or negatively open space and significantly impact the Santa Clara River and Elsmere Canyon Wildlife corridors and open space. A full environmental impact report must be completed for this project.

On February 4, 2014, a Notice of Public Hearing, advertising the City Council public
hearing, and draft Negative Declaration were placed in The Signal. Since this is the noticed public hearing on the Mitigated Negative Declaration, these comments are timely submitted before the public hearing.

**Impact to Aesthetics not adequately disclosed**
The Initial Notice incorrectly finds no impact on any areas affecting viewshed as follows:

1. **AESTHETICS - Would the project:**
   a) Have a substantial adverse effect on a scenic vista? [X] [ ] [ ]
   b) Substantially damage scenic resources, including, but not limited to, primary/secundary ridgelines, trees, rock outcroppings, and historic buildings within a state scenic highway? [X] [X] [ ]
   c) Substantially degrade the existing visual character or quality of the site and its surroundings? [ ] [ ] [X] [ ]
   d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area? [X] [ ] [ ]

In fact all three billboards are located immediately adjacent to important open space areas, including the Santa Clara River designated as a significant ecological area and the recently acquired Elsmere Open Space. Billboards in these natural areas will significantly blight the viewshed of the many commuters that enter the Santa Clarita Valley. They will also contravene the sections of our newly approved General Plan goals to protect open space and thus are inconsistent with the City's General Plan. This impact is significant and must be fully disclosed and discussed in an environmental Impact Report.

**Impacts to Biological Resources not adequately disclosed**
Two of the three billboard locations are located next to the Santa Clara River, Significant Ecological Area 23, near nesting sites for endangered bird species such as the willow flycatcher and least Bell's Vireo. (See location map attached to ND). It is common knowledge that bird species migration patterns and nesting may be interrupted by night lighting. This occurred in the City of Long Beach when, after failure to address the problems of night lighting on the Harbor Bridge, a lawsuit required substantial expenditures to reduce or eliminate glare affecting migrating birds.

No studies, reports or even disclosure of this impact was included in the Negative Declaration in spite of the fact that the Fish and Game Department refused to grant a De Minimus or no effect finding on the Santa Clara River locations (page 216 of Staff Report).

The proposed Elsmere Canyon Billboard is located in Significant Ecological Area 20 near the major wildlife corridor that connects the Santa Susanna and San Gabriel Mountain ranges. Remsen Road passes through the Los Pinetos underpass, the only underpass that can be used by animals to traverse Highway 14. This underpass was one of the major resources used by the City.

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1 Notice of Intent, Page 18
in its fight to stop the Elsmere Landfill, yet the impacts of night lighting on this significant corridor were not disclosed or investigated.

Other issues that should have been addressed 1) how construction will affect the wildlife corridor. 2) will use of this road for a commercial purpose encourage re-opening of oil wells on the property. 3) will the City be forced to grant other business uses in the future in the open space area once this industrial signage is allowed?

Apparently, no bird surveys for any of the sites have been conducted, since the ND mitigation refers to surveys that will be conducted in the future\(^3\). Future surveys and undefined mitigation is not acceptable.

**We believe that the above impacts must be disclosed and addressed. In a full EIR before any further action is taken on this contract, zone changes or other permits and entitlements.**

**Greenhouse Gas Generation**

On August 28th, 2012, the City adopted its climate action plan which requires all projects seeking a plan amendment change to comply with the plan. The ND does not quantify or disclose the amount of greenhouse gas generation created by the proposed electronic signage. It purports to mitigate a comparable amount of pollution by removing other signs, but no data is provided. Further the plan requires a REDUCTION in greenhouse gas mitigation, not just a steady state. The mitigation fails both because no data is provided to confirm what would be required, but further it does not contemplate a reduction of greenhouse gases.

**Uses proposed by this contract and entitlements may be inconsistent with the purposes for which public funds were expended for the land**

The Norland property, 58.08 acres next to the SR-14, was purchased on April 14, 2005 from Larry Rasmussen Trust for $1,150,000.00 to “assist in implementing the preservation of the Santa Clara River.” A 14’ by 48’ electronic billboard that does not meet requirements for a Fish and Game permit, certainly does not meet this purpose.

Magic Mountain Parkway / Round Mountain was dedicated to the City as part of the off site dedication in the conditions of approval for River Village. In lieu of paying Quimby fees. It must remain park land. A 14 by 48 feet electronic sign is not compatible with park space.

Rensen Road is the access and wildlife corridor for Elsmere Canyon, one of the City's largest ever open space purchases. The Notice sign for this meeting is located right next to the sign for Elsmere Canyon Open Space, stating that it was purchased with Open Space funds. The City's failure to protect this major open space purchase by marring the view and impacting the wildlife corridor is reprehensible, if not illegal.

**Unaddressed Financial Costs**

Page 92 and 93 General Lease Provisions on 93 condition for Remsen Site only- the City

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\(^3\) i.e., ND at page 53
(i.e., the taxpayers) is responsible for clean up of oil well or other contamination on site. Why is the City taking on the potentially expensive responsibility? A fiscal analysis should be conducted of the potential liability of this clause.

Will the unsightly impacts to the viewshed affect filming revenue?

How will unsightly billboards affect recreational activities and revenue generated from those uses?

**Conclusion**
We urge the City not to approve this project and, if it wishes to continue to move towards approval, table the item until a full Environmental Impact Report can be prepared to address the significant impact of this proposal.

Thank you for your attention to these concerns.

Sincerely,

Lynne Plambeck
President

Attachments:
Bird Surveys on the Santa Clara River
Picture of Hearing Notice next to Elsmere entrance