

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7  
100 S. MAIN STREET, MS 16  
LOS ANGELES, CA 90012  
PHONE (213) 266-3574  
FAX (213) 897-1337  
TTY 711  
www.dot.ca.gov



*Making Conservation  
a California Way of Life*

February 7, 2025

Erica G. Aguirre, AICP  
Principal Planner, Subdivisions  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street, 13<sup>th</sup> Floor  
Los Angeles, California 90012

RE: Trails at Lyons Canyon Project – Draft  
Environmental Impact Report (DEIR)  
SCH# 2022060346  
GTS #07-LA-2022-04707  
Vic. LA 5 PM R49.71

Dear Erica G. Aguirre,

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced project. The Project site, which is a total of 233.49 gross acres in unincorporated Los Angeles County, in the northern foothills of the Santa Susana Mountains within the Santa Clarita Valley. The Project includes several entitlements for the creation of 37 lots for the development of 510 dwelling units with a mix of attached and detached for-sale condominium units, including 24 affordable for-sale units, 47 affordable senior rental apartments, and one manager's unit; a recreational center and swimming pool; two on-site public streets; private driveways and fire lanes, including multi-purpose trails that would be open to the public; several debris basins; five-foot-wide pedestrian walkways, a water tank, and both improved and natural and preserved open space. The proposed development is clustered in northeasterly portion of the Project site, and includes several on-site block and retaining walls. The Project includes approximately 150 acres of unimpacted natural open space on-site, of which approximately 144 acres would be preserved and maintained in perpetuity through a conservation easement. Off-site Project components include sidewalk improvements, a retaining wall adjacent to The Old Road directly east of the Project site, improvements to The Old Road fronting the Project site, and fuel modification (brush thinning). The Project would include several off-site utility infrastructure component improvements, including utility water lines, upgrades to two existing pump stations, upsizing of existing sewer pipelines, and the construction of three manholes within The Old Road. Additionally, the

*"Provide a safe and reliable transportation network that serves all people and respects the environment."*

Project includes the vacation of excess right-of-way in the Old Road and acquisition of an adjacent County-owned parcel (APN: 2826-022-901). The total earth movement would be approximately 2,845,000 cubic yards, including the on-site Project components and the off-site adjacent parcel adjacent to The Old Road that includes manufactured slopes. The grading would be balanced on-site, and no import or export of soil would be required for the Project. Several on-site access and utility easements are proposed.

After reviewing the DEIR, Caltrans has the following comments:

The DEIR states that the proposed project will result in a significant and unavoidable transportation impact due to exceeding Vehicle Miles Travelled (VMT) impact thresholds. Caltrans concurs that the project creates a significant VMT impact as proposed, but does not concur that it is unavoidable. Currently, the project is designed in a way that induces a high number of vehicle trips per household due to being a low density, exclusively residential, car-oriented development. The proposed project extends the exurban area and sprawls into the Wildland Urban Interface (WUI) as designated by the California Department of Forestry and Fire Protection's Fire and Resource Assessment Program (FRAP), increasing wildfire risks in addition to the significant Vehicle Miles Travelled (VMT) impacts. The Lead Agency is encouraged to integrate transportation and land uses in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use. Building and zoning for a better balance between housing and employment opportunities can help mitigate commuting distances and create compact, walkable communities. Caltrans recommends the following to more effectively address the significant VMT impact that this project will create as currently proposed:

- Provide for a mixture of land use types within the Project's new zoning area to allow for adaptive reuse in the future. This can allow goods, services, and jobs to be created closer to where the project's residents live.
- Increase density, both vertically and horizontally. Land use developments, like the one proposed, should not sprawl across huge areas of land. By bringing the built environment closer together, and building up instead of out, it becomes possible to greatly reduce energy use, improve walkability, allow for adaptive reuse, and generate real value for the community.
- Reduce the amount of car parking whenever possible, as abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking

supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building too much parking.

- Rates of car ownership and vehicle miles traveled (VMT) are significantly lower for senior and low-income households. Seeing as this project includes both, there is sufficient justification to reduce the amount of car parking provided even further. This can help the project promote greater affordability and help achieve regional housing and transportation goals.
- There should be no more than one car parking space per unit, and at least one long-term bicycle parking space per unit.
- Caltrans recommends upgrading the proposed Class 2 bike facility on the entirety of the Old Road to a Class 4. High-visibility green paint should also be added at conflict points. The addition of these countermeasures will create a safer and more comfortable active transportation route.
- Provide an on-site transportation hub and work with local transit operators to provide high quality service to the stop.
- Ensure robust Wi-Fi availability to all units to encourage teleworking.
- Gated developments divide communities, limit transportation choices, and increase VMT. For these reasons they should be avoided. If walls are still to be allowed, numerous gates and access points should be provided for people walking or riding bicycles to be able to reach their homes and other destinations easily.
- Due to the significant VMT, a contribution should be made to the Lead Agency's VMT Mitigation Fund (if established) with the purpose of funding safer infrastructure for people walking, riding bikes, and taking transit throughout the Project area. The most effective methods to reduce pedestrian and bicyclist exposure to cars and trucks is through physical design and geometrics. These methods include the construction of physically separated facilities such as Class IV bike lanes, wide sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing.
- Additional alternative mitigation measures should be considered and implemented to reduce the impact on VMT, as reducing the project's current

impacts are critical to developing infrastructure that is both environmentally and economically sustainable. Following construction, a study needs to be conducted to confirm that the proposed mitigation measures are sufficiently offsetting the Project generated VMT. If not, new and/or additional mitigation measures need to be implemented.

By implementing these recommendations, the Trails at Lyons Canyon Project can enhance regional connectivity, improve safety for all users, reduce VMT, and support sustainable transportation choices.

Additionally, construction of the proposed project would involve deliveries of materials, components, and supplies to the various sites, and will involve oversized trucks. As a result, prior to issuance of building or grading permits for the project site, the applicant shall prepare a Construction Traffic Management Plan (CTMP) for review and approval by Lead Agency staff to reduce any impacts to less than significant levels. The CTMP needs to specify the duration of construction period and provide construction analysis on significant impacts due to increase in construction truck traffic on highways not designated as truck routes. It should also specify any work that would affect the freeways and its facilities, and that Caltrans has the jurisdiction for review and approval. Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans.

Finally, the proposed development adjoins The Old Road, which Caltrans relinquished to the County of Los Angeles in 1970. Any work within State Right-of-Way will require an Encroachment Permit from Caltrans and must meet all mandatory design standards and specifications.

If you have any questions, please contact project coordinator Anthony Higgins, at [anthony.higgins@dot.ca.gov](mailto:anthony.higgins@dot.ca.gov) and refer to GTS #07-LA-2022-04707.

Sincerely,

  
Anthony Higgins  
Acting LDR Branch Chief

Cc: State Clearinghouse