



# LAUREN

DEVELOPMENT INC.

September 7, 2007

Daniel Fierros  
Impact Analysis Section  
Los Angeles County Department of Regional Planning  
320 West Temple Street  
Los Angeles CA 90012

Re: TR066952 / Renvt200700035; Response to Comments from Leona Valley Town Council to Draft Initial Study.

Dear Mr. Fierros:

Attached please find detailed responses to issues raised by the Leona Valley Town Council (LVTC) with respect to the Draft Initial Study. Our responses, including proposed mitigation measures designed to insure that concerns raised by the LVTC remain insignificant, are in blue.

Although many of the issues raised are of legitimate concern to all, almost without exception the LVTC would not have had to address them had they reviewed the reports prepared for this project, met with the developer to discuss their concerns, or had a greater understanding of how government regulations control many of their speculated impacts. Valley Vineyards, LLC has repeatedly attempted to work with the LVTC regarding the proposed development. We have attended every monthly town council meeting over the past year. We offered to meet with their Development Committee, which prepared their comments. We have offered to share any documentation on our project they would wish to review. We have offered to explain how the impacts are governed by various county regulations. Unfortunately the LVTC has never accepted our offers and therefore remains misinformed as to the facts upon which the Impact Analysis Section's determination was based.

There are three overriding flaws in their response:

1. The LVTC did not avail themselves of, nor review, any of the numerous professionally prepared, site specific reports and documents commissioned for this project (see list of these documents later in this letter);
2. The LVTC attempts to judge the project by non-existent county or state regulations;
3. The LVTC lacks an understanding of the many safeguards inherent in existing government regulations.

Instead they cite general information, which has no relevance to the subject project, or unsupported references to potential impacts, such as their argument regarding SEAs that do not exist, and they repeatedly fail to realize that most of their hypothesized impacts will be mitigated by adherence to government regulations.



Our conclusions in this matter are supported by LVTC's own admission, as stated in their "General Assumptions and Limiting Conditions" found at the end of their submitted comments. Specifically, they state:

1. LVTC "cannot guarantee or be responsible for the accuracy of their comments;"
2. That maps photographs and exhibits are for "illustration only as an aid in visualizing matters" and "should not be relied up for any other purpose;"
3. That "no opinion is intended to be expressed for matters that require legal expertise or specialized investigation or knowledge;" and
4. That the LVTC "have no specialized expertise in the fields of biology, geology, drainage, environmental impact, land use planning, zoning, roadways, trends, populations studies, hydrology, archeology or other elements related to Valley Vineyards" and that they "have relied upon private and outside technical reports and studies related to these issues and assume said reports are accurate and reliable."

The numerous technical studies prepared and previously submitted to the county, along with our attached comments and updated reports, correctly state the facts, and are derived from one or more professional's conclusions in each technical field.

The reports which they could have availed themselves of are as follows:

1. Initial Study Questionnaire, Valley Vineyards, LLC; February 12, 2007. (NOTE: This document was submitted to your department on February 13, 2007)
2. Slope Analysis / Low Density Threshold and Maximum Density Threshold Calculations (Slope Analysis Map included); Pacific Coast Civil, Inc., February 22, 2006. (NOTE: This document was submitted to your department on February 13, 2007)
3. Preliminary Geologic and Soils Engineering Investigation, Vesting TTM 66952, Bouquet Canyon Road, Leona Valley, California; GeoConcepts, Inc.; February 5, 2007. (NOTE: This document was submitted to your department on April 18, 2007)
4. Private Sewage Disposal System, Vesting TTM 66952, Bouquet Canyon Road, Leona Valley, California; GeoConcepts, Inc.; May 1, 2007.
5. Results of a General Biological Assessment and Sensitive Plant Surveys for the Approximately 290-Acre Bouquet Canyon Project Site, Unincorporated Los Angeles County, California; PCR Services Corporation; August 15, 2006. (NOTE: This document was submitted to your department on February 13, 2007)
6. Investigation of Jurisdictional Wetlands and Waters of the U.S., Bouquet Canyon, Los Angeles California; PCR Services Corporation; August, 2006. (NOTE: This document was submitted to your department on February 13, 2007)
7. Cultural Resource Record Search Report for the Bouquet Canyon Project; PCR Services Corporation; September 08, 2006. (NOTE: This document was submitted to your department on February 13, 2007)



8. A Phase 1 Archaeological Study for TTM 066952 Located in Bouquet Canyon, Leona Valley, Los Angeles County, California; Historical Environmental Archaeological Research Team, Robert J. Wlodarski, Principal Investigator; May, 2007. (NOTE: This document was submitted to your department on June 7, 2007)
9. Los Angeles County, TTM 066952 – Valley Vineyards, Traffic Impact Analysis, Kunzman Associates, Frank Lee, Carl Ballard, and William Kunzman, P.E., July 31, 2007 (NOTE: This document was submitted to the public works department on August 10, 2007).

Additionally, the following report is attached, enclosed at the end of the responses:

1. Responses to Comments from Leona Valley Town Council regarding Biological Resources within the Draft Initial Study for the 292.49-acre Bouquet Canyon Project Site (TR0066952), Unincorporated Los Angeles County, California; PCR Services Corporation, September 7, 2007

We continue to believe that the Impact Analysis Section's determination was correctly derived in accordance with the requirements of CEQA and were based on fully verified, accurate reports, studies and research professionally prepared for the subject site.

Moving forward. As a result of the Subdivision Committee Meeting comments and conversations between Valley Vineyards, LLC and the various county agencies over the last few months, we have made some minor changes to the project to bring it into conformity with county requirements and requests. Please note the following for inclusion into the Initial Study:

1. The interior street layout has changed slightly, in order to mitigate fire department concerns regarding street lengths. One cul-d-sac – previously called out as “Street X” – has been revised and is now “Street Y” and “Street Z.” This revision has minimal impacts on the overall development so all information previously provided remains accurate.
2. Pad and grade elevations were revised to reduce unnecessary earthwork and allow the site to balance. Grading quantities have therefore been reduced from what was previously provided to you. The corrected quantities are now: 1,473,440 cut, 1,403,670 fill. The civil engineer has determined that the site will balance.
3. As you will note in our responses, we have amended our concept for handling sewage to include alternates. A determination of which system has not yet been made. The options presented are: 1) a small localized “packaged” sewer treatment facility, which serves just the homes in Valley Vineyards, providing reclaimed water to support the agricultural elements of the project; 2) individual lot treatment facilities, which could provide reclaimed water on a lot by lot basis; or 3) “enhanced” treatment septic tanks with leach fields or pits located on each lot. Different agencies regulate each option so additional research will need to be conducted to make a final determination.
4. An “Open Space Plan” which clarifies the distribution of open space has been prepared.



Should you have any questions, please do not hesitate to call me.

Very truly yours,

Valley Vineyards, LLC

By: Lauren Development, Inc.  
It's Operating Manager

John L. Allday  
Vice President

Attachments:

- ✓ Response, Comments & Proposed Mitigation Measures regarding LVTC Comments on Draft Initial Study, September 7, 2007, by Valley Vineyard, LLC
- ✓ Responses to Comments from Leona Valley Town Council regarding Biological Resources within the Draft Initial Study for the 292.49-acre Bouquet Canyon Project Site (TR0066952), Unincorporated Los Angeles County, California, September 7, 2007, by PCR Services Corporation

Copies (with attachments) to:

Supervisor Michael D. Antonovich  
Bruce McClendon, Director, Department of Regional Planning  
Norman Hickling, Deputy to Supervisor Antonovich  
Jodie Sackett  
Leona Valley Town Council