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Via Email

January 27, 2026

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Yolanda Duarte-White, Vice Chair
David W. Louie, Commissioner
Pam O'Connor, Commissioner
Michael R. Hastings, Commissioner
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**Re: Comment on the Recirculated Partial Final Supplemental Environmental Impact Report for the NorthLake Specific Plan Project; January 28, 2026
Los Angeles County Planning Commission Agenda Item 7**

Dear Chair Moon, Vice Chair Duarte-White, Honorable Planning Commissioners, and Ms. Sackett:

This comment is submitted on behalf of **Supporters Alliance for Environmental Responsibility ("SAFER")** regarding the Recirculated Partial Final Supplemental Environmental Impact Report ("RPFSEIR" or "SEIR") for the NorthLake Specific Plan Project (SCH No. 2015031080, Project No. R2015-00408-(5), Vesting Tentative Tract Map No. 07336, Tentative Parcel Map Np. 07335, Conditional Use Permit No. RPPL2023004316, Environmental Assessment No. RPPL2023004887), including all actions related or referring to the proposed development of 2,295 dwelling units, located east of Interstate (I) 5, west of Castaic Lake, and north of the community of Castaic, California in unincorporated Los Angeles County ("Project"). The Project is scheduled to be heard as Agenda Item 7 at the Los Angeles County Regional Planning Commission's January 28, 2026 meeting.

SAFER is concerned that the RPFSEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. Among other concerns, SAFER has identified the following issues:

1. A project will have a significant greenhouse gas ("GHG") impact if it conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. (CEQA Guidelines, App. G, § VIII.) Here, the SEIR

concludes that the Project will have a less than significant GHG impact. However, after reviewing the SEIR, SAFER found that the Project conflicts with the California Air Resources Board's 2022 *Scoping Plan for Achieving Carbon Neutrality* ("2022 Scoping Plan"), which identifies strategies for achieving California's long-term climate goal of carbon neutrality by 2045 or earlier. Any revised EIR must show how a project will conform to current statewide GHG reduction targets and adopt enforceable mitigation to achieve these goals. (*Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 225-26; *League to Save Lake Tahoe v. County of Placer* (2022) 75 Cal.App.5th 63, 121-22.) As such, the Project's conflict with the 2022 Scoping Plan is a significant GHG impact that must be analyzed and mitigated in a revised RPFSEIR.

2. The RPFSEIR failed to adequately analyze vehicle miles traveled ("VMT") impacts because it applied an incorrect and outdated threshold of significance to measure impacts. The Department of Transportation's ("DOT") May 29, 2025 comment on the Draft SEIR states that the County applied an outdated threshold to measure VMT impacts. (RPFSEIR, p. A.2-3.) Specifically, the DOT explains that the County incorrectly applied the prior Northlake Specific Plan VMT per service population (27.03) as the significance threshold for determining an impact. However, the VMT per Service Population (27.03) is the baseline for comparison to the previously approved Project. The County was required to apply the VMT per Service Population (25.70) per the methodology required by the County Department of Public Works. Therefore, the RPFSEIR's less-than-significant conclusion for VMT impacts cannot be relied upon. A revised Draft SEIR should be prepared and recirculated that includes an adequate analysis of the Project's VMT impacts using the proper threshold of significance.
3. Since the Project will have significant unmitigated impacts, the City must analyze whether the Project's economic benefits exceed its environmental impacts before adopting a statement of overriding considerations. (14 Cal. Code Regs. § 15043; Pub. Res. Code § 21081(B); *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1222.) Key among the findings that the lead agency must make is that:

"Specific economic, legal, social, technological, or other considerations, ***including the provision of employment opportunities for highly trained workers***, make infeasible the mitigation measures or alternatives identified in the environmental impact report...[and that those] benefits of the project outweigh the significant effects on the environment."(Pub. Res. Code §21081(a)(3), (b).)

Thus, the County must analyze whether the Project provides "employment opportunities for highly trained workers." The RPFSEIR contains no such analysis.

4. SAFER also agrees with the expert findings of the Center for Biological Diversity ("CBD") regarding the Project's significant biological resources, VMT, GHG, and wildfire risk impacts, among others. CBD reviewed the Project and the Draft SEIR

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and prepared expert comments on the Draft SEIR, which were submitted on May 29, 2025. CBD's comments on the Draft SEIR also apply to the RPFSEIR. SAFER adopts by reference all comments filed by CBD in this matter. CBD concluded that the SEIR failed to adequately analyze and mitigate the Project's biological resources, VMT, GHG, and wildfire risk impacts, among others. Specifically, CBD found, *inter alia*, that:

- a. The SEIR fails to consider new information regarding significant impacts to mountain lions, burrowing owls, and wildlife movement.
- b. The SEIR's analysis of impacts to special-status species, including western spadefoot, is inadequate.
- c. The Project will have significant wildfire risks not analyzed or mitigated by the SEIR.
- d. The SEIR fails to adequately analyze and mitigate VMT impacts.
- e. The SEIR fails to consider new scientific knowledge and state policy on climate change.
- f. The SEIR fails to consider significant new information regarding California's water supply.
- g. The SEIR's revised alternatives analysis continues to be inadequate.

SAFER requests that the Planning Commission deny approving this Project, and instead, direct staff to address these shortcomings in a revised recirculated partial draft supplemental environmental impact report prior to considering approvals for the Project.

SAFER reserves the right to supplement these comments during the administrative process. (*Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1121.)

Sincerely,


Victoria Yundt
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