
Statement of Overriding Considerations

Trails at Lyons Canyon Project Environmental Impact Report (State Clearinghouse Number 2022060346)

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Prepared for:

LOS ANGELES COUNTY DEPARTMENT OF REGIONAL PLANNING



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Introduction

When a proposed project results in significant, unavoidable adverse impacts, the California Environmental Quality Act (CEQA) requires the decision-making body of the Lead Agency to weigh the benefit of the proposed project against such environmental impacts in determining whether or not to approve the proposed project (State CEQA Guidelines Section 15043). In making this determination the Lead Agency is guided by State CEQA Guidelines Section 15093, which states:

- CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”
- When the Lead Agency approves a project that will result in the occurrence of significant effects, which are identified in the Final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. The Statement of Overriding Considerations shall be supported by substantial evidence in the record.
- If an agency makes a Statement of Overriding Considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

In addition, Public Resources Code Section 21081(b) requires that when a public agency finds that economic, legal, social, technological, or other reasons make infeasible the mitigation measures or alternatives identified in the Environmental Impact Report (EIR) and the project thereby continues to have significant unavoidable adverse impacts, the public agency must also find that specific overriding economic, legal, social, technological, or other benefits of the project outweigh those significant unavoidable impacts of the Project.

The EIR prepared by the Los Angeles County Department of Regional Planning (LA County Planning) for the Trails at Lyons Canyon Project (Project), which consists of the Draft EIR and the Final EIR (collectively the “EIR”) analyzes the potential environmental effects associated with the creation of 37 lots for the development of 510 dwelling units with a mix of two- and three-story attached and detached for-sale condominium units, and a four-story affordable senior rental apartment building on approximately 233 acres in unincorporated Los Angeles County (County). The Project includes the development of 291 buildings and the following features and amenities: two 57- to 64-foot-wide onsite public streets, 26- to 36-foot-wide private driveways and fire lanes providing access to all units, five-foot-wide pedestrian walkways throughout the development, several debris basins, a water tank, a 4,540 square-foot recreational center, and an outdoor swimming pool.

The Project includes both improved and natural and preserved open space (approximately 75% of the Project site). The improved open space includes several open space areas, including a dog park and parklets throughout the development area. The private driveway and fire lane surrounding the entirety of the residential development will serve as a multi-purpose trail. This multi-purpose trail system would connect to trails in the southern portion of the Project site. After implementation of the Project, all on-site trails would be open to the public.

The Project includes approximately 150 acres of unimpacted natural open space on-site. A majority (over 144 acres and 62% on the Project site) of the on-site natural open space would be preserved and maintained in perpetuity

through a conservation easement. The Project would plant 856 ornamental trees and would be required to plant 772 native/mitigation replacement trees within the conservation and landscaped areas.

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 includes 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 Project also includes the vacation of excess right-of-way in the Old Road and acquisition of an adjacent County-owned parcel (Assessor's Parcel Number [APN]: 2826-022-901).

Finally, in accordance with MM-4.4-9, Off-Site Habitat Preservation, the Project Applicant shall demonstrate recordation of a conservation easement that permanently preserves off-site habitat for long-term conservation and management (i.e., Off-Site Conservation Area). The Off-Site Conservation Area shall include six parcels located within the Santa Susana Mountains/Simi Hills Significant Ecological Areas (SEA), approximately one mile south-southwest of the Project site (Assessor Parcel Numbers 2826-018-034, 2826-017-044, 2826-017-043, 2826-017-041, 2826-014-057, and 2826-014-067). These parcels consist of 466.70 acres of natural open space adjacent to existing publicly owned lands within the subject Santa Susana Mountains/Simi Hills SEA. As such, the Project would conserve 466.70 acres of natural open space within the subject SEA under a conservation easement.

Within the 466.70 acres of preserved natural open space preserved off-site, 127.50 acres of off-site mitigation land is required, which includes 18.39 acres of mitigation land under SEA Resource Category 1, 44.31 acres of mitigation land under SEA Resource Category 3, and 64.80 acres of mitigation land under SEA Resource Category 4. As such, the Project would provide an additional 339.20 acres of natural open space preserved off-site in perpetuity within an SEA that is above and beyond the mitigation requirements for SEA resources of the Project.

Significant and Unavoidable Impacts of the Project

As explained and supported by substantial evidence set forth in the EIR, the studies and other documents referenced therein, and the Findings and Facts in Support of Findings (Findings of Fact Regarding the Environmental Impact Report for the Trails at Lyons Canyon Project), despite implementation of all feasible mitigation, the Project's vehicle miles traveled (VMT) would exceed the County's threshold of 10.6 residential VMT per capita, resulting in a significant and unavoidable impact. (DEIR, pp. 4.17-21 through 4.17-25.) Transportation (VMT) is the only significant and unavoidable environmental effect of the Project.

Operational Transportation Impacts (VMT)

The Project was forecasted to generate 20.5 VMT per capita (see DEIR p. 4.17-22). The Project was thus determined to exceed the County's threshold of 10.6 residential VMT per capita by 9.9 VMT per capita. Mitigation Measure MM-4.17-2 (Transportation Demand Management [TDM] Program) includes several strategies aimed at reducing VMT. These include neighborhood design elements that encourage walking, biking, and taking transit, such as the construction of new bike lanes along the Project's "A" and "B" Streets and on the multi-purpose trail, an e-bikeshare program, and other community-based and trip reduction strategies. However, the implementation of MM 4.17-2 would result in a reduction of 1.5 VMT from 20.5 to 19 VMT per capita, still exceeding the County's threshold of 10.6 VMT per capita. Thus, despite the implementation of all feasible mitigation measures, the Project would have a significant and unavoidable impact on VMT.

Finding: The Regional Planning Commission of the County of Los Angeles finds and determines in approving the Trails at Lyons Canyon Project that the EIR has considered the identified means of lessening or avoiding the Project's significant effects and that to the extent any significant direct or indirect environmental effect remains unavoidable or not mitigated to below a level of significance after mitigation, such impact is at an acceptable level in light of the social, legal, economic, environmental, technological and other Project benefits discussed below, and such benefits override, outweigh, and make "acceptable" any such remaining environmental impacts of the project (CEQA Guidelines Section 15092(b)).

The following benefits and considerations, taken together or individually, outweigh such significant and unavoidable adverse environmental impacts. All of these benefits and considerations are based on the facts set forth in the Findings, the EIR (including, without limitation, the Draft EIR and the Final EIR including the response to comments and appendices and attachments thereto), all information and documentation presented to the Regional Planning Commission of the County of Los Angeles and the record of proceedings for the Project. This Regional Planning Commission of the County of Los Angeles finds that the evidence in the record constitutes substantial evidence to support the determinations made in this Statement of Overriding Considerations, that the facts stated in this document and in the Findings are true and accurate representation and are supported by substantial evidence in the record, including testimony received at the public hearing, the staff presentations, staff reports and all materials in the record of proceedings and the Project files. The Regional Planning Commission also finds that to the extent other evidence was presented that is contrary to the determinations made herein or in the Findings, such evidence was nevertheless considered, weighed and determined to be either lacking in credibility or insufficient in weight to detract from the determinations made herein or in the Findings such that the Regional Planning Commission reached these findings after due consideration of all evidence presented to it. Each of these benefits and considerations is a separate and independent basis that justifies approval of the Project, so that if a court were to set aside the finding that any particular benefit or consideration will occur and justifies Project approval, this Regional Planning Commission finds that it will stand by its finding that the remaining benefit(s) or consideration(s) is or are sufficient to warrant Project approval.

Facts in Support of Statement of Overriding Considerations: Each benefit set forth below constitutes an overriding consideration warranting approval of the Project, independent of the other benefits, and the Regional Planning Commission finds that the adverse environmental impacts of the Project are "acceptable" if any one of these benefits will be realized. The Project will provide benefits to Los Angeles County and the region as follows:

- 1. Provide a diverse mix of housing units in various typologies that would assist the County in obtaining its regional housing needs allocation (RHNA) goals, including very low-income housing and moderate/middle-income households:**

The Project proposes the construction of 510 total residential dwelling units with a mix of attached and detached dwelling units, including 24 affordable for-sale condominium dwelling units (averaging 135% Area Median Income [AMI]). Additionally, an approximately 10% set aside of 47 affordable senior rental units in one multifamily building would be provided for very-low-income seniors (50% AMI) and one rental unit at market rate for an on-site manager. In total, the Project would provide 71 affordable dwelling units (24 for sale condominiums and 47 rental apartment units), representing approximately 15% of the Project's base number of dwelling units. Unincorporated Los Angeles County has been allocated a total of 90,052 housing units for the planning period between 2021 and 2029 (HCD 2025). The County has only attained 5,160 (5.7%) of its current RHNA, even though the County is 50% through the 6th Cycle (HCD 2025). Similarly, only 9,201 (33.8%) of the County's 5th Cycle RHNA goals were attained through housing production

between 2013 and 2021 (HCD 2025). The Project's construction schedule is anticipated to be completed by 2029; thus, housing units will be available to be occupied within the timeframe of the 6th Cycle (2021-2029). Therefore, the Project will help the County achieve its regional housing needs, including very low-income housing and moderate/middle-income households.

2. Provide housing opportunities consistent with the Los Angeles County General Plan 2035 and the Santa Clarita Valley Area Plan, One Valley One Vision, a component of the General Plan and applicable to the unincorporated portions of the Santa Clarita Valley:

The Los Angeles County General Plan 2035 (General Plan) land use designation for the Project site is Residential 2 (H2), which would allow for development of the Project as currently proposed. The Santa Clarita Valley Area Plan, also known as "One Valley One Vision" (OVOV), defines the Residential 2 (H2) land use designation as "urban residential," allowing a permitted residential density of up to two dwelling units per net acre. According to the OVOV plan, the Residential 2 (H2) designation provides for residential neighborhoods at densities that require urban services, providing a transition between higher density, urban development and rural communities throughout the planning area. Within land designated Residential 2 (H2), density-controlled development (clustering) is encouraged on lands with significant environmental and or topographical features or resources, in order to preserve open space for protection of these natural features or resources.

The Project would be consistent with the existing General Plan land use designation and no General Plan Amendment is required. The Applicant is requesting a density-controlled development Conditional Use Permit, meaning that the Project's proposed residential development would be clustered within the northeastern portion of the Project site. The Project would include approximately 150 acres of the Project site as preserved open space. Thus, the Project would provide housing opportunities and preserve open space through clustering, consistent with the General Plan and OVOV.

3. Provide a mix of housing types proximate to convenient freeway access and existing roadway infrastructure:

The Project would construct 510 dwelling units with a mix of attached and detached dwelling units and affordable senior housing. As a result of the proposed density-controlled development, the Project's proposed residential development would be clustered within the northeastern portion of the Project site within 41.47 acres. The northeastern portion of the site is closest to existing development, and service systems (e.g., water, wastewater, power, telecommunications, etc.), and is more readily accessible from Interstate 5 (I-5) via The Old Road, which would promote efficiencies in services, transportation, and infrastructure. Thus, the Project would provide a mix of housing types proximate to convenient freeway access and existing roadway infrastructure.

4. Provide substantial homeownership opportunities for middle-income families in an area proximate to existing residential uses and infrastructure:

The Project site is bounded by residential uses to the north in the unincorporated County and by The Old Road and I-5 on its northeastern boundary, with residential and commercial uses located on the eastern side of I-5, within the City of Santa Clarita. The Project proposes the construction of 510 total residential dwelling units, including 24 for-sale condominium units to be deed-restricted for moderate- or middle-income households in compliance with the County's Inclusionary Housing ordinance requirements. Of the 510 total residential dwelling units, the Project includes 462 attached and detached for-sale dwelling units, while 48 units would be rentals within the senior apartment building (as noted, 47 of these rental units will be dedicated to very low-income

seniors). The proposed Project would cluster residential development within the northeastern portion of the Project site closest to existing residential uses and infrastructure, as noted above.

5. Provide a mix of housing types within a clustered development to limit the amount of the site subject to disturbance, limit the amount of urban wildland interface areas, preserve significant ridgelines, preserve biological resources, and provide a substantial amount of natural open space within the Project site:

As discussed above, the Project would construct 510 dwelling units with a mix of attached and detached dwelling units, including a total of 71 affordable dwelling units (24 for-sale condominiums and 47 rental apartment units for senior living). The Applicant is requesting a Conditional Use Permit for density-controlled development, meaning that the Project's proposed residential development, roadway infrastructure, and service systems would all be clustered within the northeastern portion of the Project site. The Project's on-site impact area, including the Project development footprint, fuel modification zones, and debris extents, would occupy approximately 83 acres in the northeastern portion of the Project site, thereby allowing for preservation of approximately 150 acres of the 233-acre Project site as preserved open space of which 144.43 acres would be preserved in perpetuity through a conservation easement. The Project's proposed clustering of development and preservation of open space would reduce impacts to wildlife, natural drainage courses, protected trees, and biological resources. It would preserve significant ridgelines by avoiding development in these areas and would limit the amount of urban-wildland interface areas.

In addition to on-site preservation of open space, through the Project's off-site Conservation Areas, the Project would provide ecological benefits resulting from the permanent preservation of approximately 467 acres of natural open space containing biological and Significant Ecological Area (SEA) resources. As stated previously, of the 467 acres of the proposed permanently preserved natural open space off-site, exceeding the SEA mitigation requirements by 339 acres. These resources would also be preserved and managed in perpetuity through the recordation of a conservation easement.

6. Provide a comprehensive trail network, including publicly accessible trailhead, that provides connections for the public to access existing open space areas and established trails:

The Project would include a publicly accessible on-site trail system that would include linkages to adjacent off-site trail networks and open space areas that would expand and provide connections to existing trail facilities. Several existing non-dedicated trails on the Project site would be preserved and would connect to existing off-site trail systems and open space areas to the east and west of the Project site. The Project would also construct a multi-purpose private driveway and fire lane along the outer northern and western edge of the development area with pedestrian access that would be ungated and available for public pedestrian/hiking/biking use; vehicular access would be gated. The access road would serve as a multi-purpose trail system and would have a reciprocal access easement to provide access to all residential lots, open spaces, and County-maintained facilities. A new, publicly accessible trailhead would be constructed near the gated connection of the access road to The Old Road at the northeastern corner of the Project site. Additionally, a portion of the proposed private access road will replace the existing Lyons Ranch Road and would continue off-site towards the existing open space area to the west. Therefore, the Project would provide a comprehensive trail network, including a publicly accessible trailhead, providing connections for the public to access existing open space areas and established trails.

In addition to the above benefits derived from the Project's stated objectives, the Project would also result in fire protection and safety benefits, including a new emergency water supply system and defensible space

improvements. As part of the larger water system within the Project site (which would include internal water lines, fire hydrants, and fire sprinkler systems), an up to 2-million-gallon gravity-fed water tank would provide additional water resources to the Project and surrounding communities. Providing water where it is not currently available, especially when it is provided in a protected environment like the ignition-resistant landscapes of a new master-planned community such as the Project, would enable firefighters to protect homes and aid in controlling a wildfire's advancement. The Project would also provide landscaping and fuel modification zones which would serve as a fuel break and offer opportunities for fighting and controlling wildfires before they encroach upon existing nearby neighborhoods. As such, the configuration of proposed density-controlled development that is held to stringent and newer standards than the surrounding built communities would provide a buffer from wildfires for the surrounding communities. Furthermore, in addition to the required Fire Facility Fee payment, the Project Applicant would provide a community benefit contribution of \$2,000,000 to be used by the Consolidated Fire Protection District of Los Angeles County towards its purchase of firefighting equipment to further enhance the District's continued provision of fire protection services within its jurisdiction, including the Project area. This funding would be used for the County's procurement of two fire engines, including outfitting, equipment, and communication costs, which could be used to further protect the Project site and surrounding communities.

Finally, the Project would have direct, indirect, and induced economic benefits stemming from both short-term construction activities and ongoing operation. Project construction is estimated to generate approximately \$31,770,000 in federal, state, and local tax revenue (including approximately \$1,200,000 in local property taxes), while total labor income from construction is estimated to amount to approximately \$103,000,000 (LAEDC 2020). Once constructed, the total economic output generated by Project residents is estimated to reach approximately \$30,000,000 annually, diversified between a variety of industries (LAEDC 2020). In addition, the Project's ongoing activities would have a fiscal impact of just over \$4,000,000, including an approximately \$2,000,000 increase in state and local tax revenue (LAEDC 2020). The economic benefits would be much greater than those currently provided now as the Project site is vacant and undeveloped.

Conclusion: CEQA requires a public agency to balance the benefits of a proposed project against its significant and unavoidable adverse impacts in determining whether to approve the project. As discussed more fully above, the Project would result in a significant and unavoidable impact for transportation (VMT) that, although mitigated to the extent feasible by the implementation of mitigation required for the Project, would remain a significant and unavoidable adverse impact. This Regional Planning Commission finds that such an impact is at an acceptable level in light of each of the Project benefits described above and make "acceptable" any such remaining significant environmental impacts of the Project.

References

HCD (California Department of Housing and Community Development). 2025. "Annual Progress Reports - Data Dashboard and Downloads: Housing Element Implementation and APR Dashboard." Accessed March 2025. <https://www.hcd.ca.gov/planning-and-community-development/housing-element-implementation-and-apr-dashboard>.

LAEDC (Los Angeles Economic Development Corporation) and Santa Carita Valley Economic Development Corporation. 2020. "Lyon's Canyon: An Economic Impact Analysis." April 2020.