Findings of Fact

Trails at Lyons Canyon Project State Clearinghouse No. 2022060346

JULY 2025

Prepared for:

LOS ANGELES COUNTY DEPARTMENT OF REGIONAL PLANNING

LA COUNTY PLANNING

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1 Introduction

The California Environmental Quality Act (CEQA), Public Resources Code (PRC) Section 21081, and the Guidelines for Implementation for the California Environmental Quality Act, Title 14 California Code of Regulations (CCR), Section 15091 (State CEQA Guidelines), require that a public agency consider the environmental impacts of a project before a project is approved and make specific findings. PRC Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The same statute provides that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." PRC Section 21002 further states that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles in PRC Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which environmental impact reports (EIRs) are required. For each significant environmental effect identified in an EIR for a project, the approving agency must issue a written finding reaching one or more of three permissible conclusions. PRC Section 21081(a) and the State CEQA Guidelines Section 15091(a) require that no public agency approve or carry out a project for which an EIR has been completed that identifies one or more significant effects thereof, unless such public agency makes one or more of the following findings:

> Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
>
> Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can or should be adopted by such other agency.
>
> Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required; however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency. (CEQA Guidelines, Section 15091, subd. (a),(b).)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, Sections 15093, 15043, subd. (b); see also PRC Section 21081, subd. (b).) The EIR for the Trails at Lyons Canyon Project (Project) concluded the Project would create one significant and unavoidable impact; thus, a Statement of Overriding Considerations is required.

These Findings of Fact (findings) constitute the County of Los Angeles' (County's) best efforts to set forth the evidentiary and policy basis for its decision to approve the Project in a manner consistent with the requirements of CEQA. To the extent that these findings conclude that various mitigation measures outlined in the Final EIR are feasible and have not been modified, superseded, or withdrawn, the County hereby binds itself to implement these measures. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when the County adopts a resolution approving the Project.

1.1 Document Format

These Findings of Fact have been organized into the following Sections:

- Section 1 provides an introduction to these findings.
- Section 2 sets forth the required findings regarding environmental effects determined to have no impact or a less than significant impact on the environment.
- Section 3 sets forth findings regarding potentially significant environmental impacts that the County has determined can be feasibly mitigated to a less than significant level through the imposition of mitigation measures.
- Section 4 sets forth findings regarding those significant or potentially significant environmental impacts which the County has determined will remain significant and unavoidable, despite incorporation of all feasible mitigation measures.
- Section 5 sets forth findings regarding alternatives to the Project.
- Section 6 sets forth findings regarding significant irreversible environmental changes that would occur should the Project be implemented.
- Section 7 sets forth findings regarding the Project's growth-inducing impacts.

2 Findings Regarding Project Environmental Effects Determined to Have No Impact or a Less than Significant Impact on the Environment

The County hereby finds that the following potential environmental impacts of the Project have no impact or are less than significant, and therefore, do not require the implementation of Mitigation Measures (MMs). The County's findings are referred to herein as "Findings 1".

In the analysis provided in Sections 2 and 3, in the instance where there is no header specifying "construction" or "operation," the EIR analysis was conducted without segregation into separate construction and operational categories, or the impact was determined to be less than significant with mitigation, and as such, is included under Section 3, Findings Regarding Project Environmental Effects Determined to be Less than Significant with Mitigation Incorporated. For example, regarding instances where there is no header within either Section 2 or 3, compatibility or consistency with plans, guidance documents, or regulations generally applies to operations, but could sometimes apply to construction. Therefore, no specific operation or construction headers are included for those impacts.

2.1 Aesthetics

2.1.1 4.1a Scenic Vista

Impact 4.1a Would the project have a substantial adverse effect on a scenic vista?

Finding: Less Than Significant Impact (Draft EIR [DEIR], pp. 4.1-23 through 4.1-27.)

Facts in Support of Finding: Operation. While implementation of the Project would introduce new development and other improvements to an undeveloped site, the proposed uses would be visually compatible with the land uses to the north, northeast, and east, which are largely composed of residential developments similar to the Project. The on-site residential development would include two- to three-story townhouses on Lots 2 through 9 ranging from 26 feet to 38 feet in height and a senior housing facility with a maximum height of 45 feet on Lot 10, which would incorporate simple lines and be appropriately scaled to be in accordance with the surrounding environment. A one-story recreation facility (approximately 20 feet tall) would be located on Lot 13. All buildings would be finished in light sand-colored stucco, with tan, brown, and/or terra cotta concrete "S" tile roofing. Other vertical features on site include an approximately 45-foot-tall water tower located on Lot 29 southwest of the residential area. All electrical infrastructure, including transmission lines, would be underground. The overall planting palette, composed of shade and accent trees, screening shrubs and hedges, groundcovers, vines, and lawn, has been designed to reflect a distinctive sense of place for the Project. A total of 750 ornamental trees and 772 native/mitigation trees would be planted on site. Combined, the compact layout, building design, and landscaping would result in a cohesiveness of design across the developed portion of the Project site. Thus, development of the site with residential and associated uses would not result in an aesthetically deficient development.

In addition, the Project would comply with existing County requirements and laws regulating development in visually sensitive areas (e.g., hillside areas, Significant Ecological Areas [SEAs]), which would reduce impacts to on-site scenic resources included in viewsheds available from I-5, Taylor Trail, and Don Mullally Trail. Pursuant to Chapter 22.140.170 (Density Controlled Development) of the Zoning Code, the Project would employ a density-controlled development program that would cluster development in the lower-lying, northeastern area of the Project site closest to the I-5 corridor. The Project would conserve approximately 150 acres of the Project site as natural open space. The natural open space would be contiguous and concentrated in the southern/southwestern portion of the Project site and would include many of the Project site's important visual resources, include Hillside Management Areas (HMAs), oak woodland habitat, and the on-site, County-designated significant ridgeline. The Project would also be required to comply with Chapter 22.104 (HMAs) of the Zoning Code and would implement design features to comply with applicable Hillside Design Guidelines standards, which would further minimize any impacts to hillside areas which could potentially degrade the quality of scenic viewsheds. The Project would also comply with Chapters 22.102 (SEAs) and 22.174 (Oak Tree Permit) of the Zoning Code, which further regulate the location, nature, and extent of development allowable within SEAs, and the disturbance and/or removal of oak trees, respectively.

To reduce potential impacts to scenic vistas resulting from increased development in the County's unincorporated areas, the Los Angeles County 2035 General Plan (General Plan) and the One Valley, One Vision (OVOV) include goals, objectives, and policies related to the preservation of topography, open space, woodlands, and other scenic resources. The Project would not conflict with any goals, policies, or objectives set forth in the General Plan or OVOV related to aesthetics or visual resources.

The Project would construct a paved access road (the existing unpaved Lyons Ranch Road) along the outer northern and western edge of the development area that would serve as a part of an on-site, multi-use trail system and would connect to existing non-dedicated trails in the south/southwest portions of the Project site. An existing non-dedicated trail would be dedicated to the County as part of the Project. This proposed dedicated on-site trail and the paved access road would be available for public use. Some of the non-dedicated, on-site trails (which are currently private) would, as a result of Project implementation, become public, dedicated trails and would provide access to views of on-site features, including the County-designated significant ridgeline, as well as other hillside and valley terrain supporting grassland, shrubland, and woodland communities within the Santa Susana Mountains/Simi Hills SEA. The Project would also construct a new trailhead near the gated connection of the paved access road to The Old Road at the northeastern corner of the Project, which would encourage access and use of the on-site trails. The on-site proposed to-be-dedicated trails would connect to adjacent public open spaces and trail networks outside of the Project's boundaries, including the City of Santa Clarita's Rivendale Park and Open Space in Towsley Canyon to the south. Therefore, the on-site trails proposed by the Project would increase connectivity to the existing public trail system and ensure that access to views of on-site visual resources (and access to views of other undeveloped lands to the west and south) would be preserved.

While the Project would be within the viewshed of certain scenic vistas available from the Taylor Trail, Don Mullally Trail, and I-5 corridor, a substantial adverse effect would not occur as the Project would: be low-profile in nature and visually consistent with the neighboring urban environment to the north, northeast, and east; reduce streetscape clutter through the removal of an existing roadside billboard; comply with applicable Hillside Design Guidelines and other applicable provisions of the Zoning Code regulating development in HMAs; and implement clustering of residential development, allowing for minimization of the Project's development footprint, and the preservation of the majority of the site as natural land. The preserved lands would include visually sensitive elements such as HMAs, the on-site significant ridgeline, and biological resources within an SEA. Further, the Project would not be anticipated to contribute to a substantial source of smog that could obstruct views of distant regional

mountains and ridgelines. Operational lighting would not result in substantial light pollution that could obstruct views of distant regional mountains and ridgelines, including the Santa Susana Mountains and Simi Hills to the south, or the Angeles National Forest ridgelines to the north. Therefore, Project operation would not result in a substantial adverse effect on a scenic vista available from I-5 South, Taylor Trail, or Don Mullally Trail, and impacts would be less than significant. (DEIR, pp. 4.1-23 through 4.1-27.)

2.1.2 4.1b Views from Trails

Impact 4.1b Would the project be visible from or obstruct views from a regional riding, hiking, or multi-use trail?

Finding: Less than Significant Impact (DEIR, pp. 4.1-27 through 4.1-28.)

Facts in Support of Finding: Scenic vistas are available from Taylor Trail, Don Mullally Trail, and Interstate-5 (I-5). Unlike viewers at a fixed scenic vista vantage point (e.g., tall building, bridge) or dedicated lookout point, viewers on I-5, Taylor Trail, and Don Mullally are mobile, and the scenic vistas available from these areas are not static or limited to a particular vantage point. Views and vistas are dynamic and changing, and many similar views and vistas are continually available to viewers from these locations that do not include the northern/northwestern portion of the Project site and therefore would not be impacted by the Project. While the Project would be within the viewshed of certain scenic vistas available from the Taylor Trail, Don Mullally Trail, and I-5 corridor, a substantial adverse effect would not occur as the Project would be low-profile in nature and visually consistent with the neighboring urban environment to the north, northeast, and east; reduce streetscape clutter through the removal of an existing roadside billboard; comply with applicable Hillside Design Guidelines and other applicable provisions of the County Zoning Code regulating development in HMAs; and implement clustering of residential development, allowing for minimization of the Project's development footprint, and the preservation of the majority of the site as natural land. The preserved lands would include visually sensitive elements such as HMAs, the on-site significant ridgeline, and biological resources within a SEA. Project-related construction activities would require the use of construction equipment and storage of materials on the Project site. Although distant views of graded areas, stockpiled soils, and other materials generated during construction could potentially be visible from the Rim of the Valley Trail, these activities would not be largely discernable due to the intervening distance from the Project site (i.e., over 2 miles). Furthermore, at approximately 3,000 above mean sea level (amsl), the Rim of the Valley Trail is at a significantly higher elevation than the Project site (approximately 1,654 feet amsl at the southwest corner to approximately 1,300 feet amsl at the northeast corner), thus, key visual resources in the foreground (e.g., hillsides and canyons) and available vistas of the Santa Clarita Valley and more distant terrain including mountains and ridgelines of the Angeles National Forest would not be obstructed by construction activities on the Project site. Additionally, the Project's temporary construction elements would only affect some of the long-range views along this trail. Project construction would not be incompatible with existing viewshed elements and would not obstruct trail-user views from the Rim of the Valley Trail. The Project would not be anticipated to contribute to a substantial source of smog that could obstruct views of distant regional mountains and ridgelines. Operational lighting would not result in substantial light pollution that could obstruct views of distant regional mountains and ridgelines, including the Santa Susana Mountains and Simi Hills to the south, or the Angeles National Forest ridgelines to the north. Therefore, the Project would not result in a substantial adverse effect on a scenic vista available from I-5 South, Taylor Trail, or Don Mullally Trail, and impacts would be less than significant (DEIR, pp. 4.1-27 through 4.1-28.)

2.1.3 4.1c Scenic Resources within a Scenic Highway

Impact 4.1c Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Finding: Less than Significant Impact (DEIR, pp. 4.1-28 through 4.1-29.)

Facts in Support of Finding: There are no officially designated scenic highways that pass by the Project site. The Project site is visible from I-5, an eligible state scenic highway, and on-site scenic resources within view of the I-5 corridor include grassland, shrubland, and woodland habitats within the Santa Susana Mountains/Simi Hills SEA, as well as hillside areas, including HMAs and a significant ridgeline. While development of the Project site as proposed would alter the character of existing hillside and valley terrain and would require the removal of on-site vegetation communities in development areas to accommodate future residential and associated uses, no corridor protection program has been developed or implemented for I-5, and thus, it has not been officially designated as scenic by the state. Further, due to the size of the Project site in relation to the wider landscape visible from the I-5 corridor in the vicinity, proposed development of the site would not substantially affect the potential for the I-5 corridor to be officially designated as scenic by the state should the County ever prepare a corridor protection program and seek further scenic designation. For these reasons, the Project would not substantially damage scenic resources within a state scenic highway, and impacts would be less than significant. (DEIR, pp. 4.1-28 through 4.1-29.)

2.1.4 4.1d Public Views of the Site

Impact 4.1d Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage point)

Finding: Less than Significant Impact. (DEIR, pp. 4.1-30 through 4.1-34.)

Facts in Support of Finding: Operation. Public views of the Project would be available from several of the local, dedicated trails to the south and southeast of the Project site. Mountainous terrain to the west and south would provide views to approximately 40% to 80% of the Project site. However, these areas encompass ridgelines and other steep terrain that are not crossed by public trails and thus, are either difficult to access or provide no dedicated public access. Regarding trails, available views to portions of the Project site would generally be limited to Taylor Trail. Views to portions of the Project site (between 1% and 20%) would be available to I-5 motorists and generally, residential lands (and currently vacant lands along Wiley Canyon Road) to the east of the Project site and I-5. To the east of I-5, these areas generally encompass private lands inaccessible to the public and/or private residential properties.

While implementation of the Project would introduce residential uses and other improvements to an undeveloped site, the proposed uses are compatible with the land uses to the north, northeast, and east, which are largely composed of residential developments similar to the Project. While the Project would be visible from public vantage points and elsewhere along dedicated trails to the south and south east, and would partially obstruct and/or interrupt existing views of existing visual resources, the Project would not substantially degrade the visual quality and character of the Project site or surrounding areas as the Project would develop a high-quality mix of residential

components with a focus on natural open space conservation and orderly development of the Project site. The Project would be scaled and visually consistent with neighboring urban development and natural open space, on-site trails, and trail head improvements proposed by the Project would serve to provide important missing linkages in the existing dedicated trail network and would expand trail facilities consistent with the objectives of the Santa Susana Trails Master Plan.

Therefore, although the Project would result in limited obstruction and/or interruption of views from publicly accessible vantage points, including the limited nature of visibility from I-5, The Old Road, and dedicated trails in the Project site vicinity, the high-quality nature and cohesiveness of design exhibited by on-site development and landscaped areas, the preservation of approximately 150 acres of the Project site as natural open space, the inclusion of on-site pocket parks and Homeowners' Association (HOA) maintained open spaces, and compliance with existing regulations, the Project would not result in the substantial degradation of visual quality or character of the Project site and surrounding areas, and impacts would be less than significant (DEIR, pp. 4.1-30 through 4.1-34.)

Applicable Zoning. As stated in County Zoning Code Section 22.16.030 and 22.20.030, the Project's proposed development of townhouses and senior housing (i.e., adult residential facilities serving seven or more persons) are conditionally permitted within the C-3 and A-2 zones. The Project would require a CUP which requires COAs for the Project. Once the CUP is approved, including the requested incentives and waivers, the Project would be in compliance with applicable zoning regulations governing scenic quality. In accordance with required development standards, Project development would not exceed 45 feet in the C-3-DP zone (County Zoning Code Table 22.20.040-A). Therefore, the Project would not conflict with applicable zoning regulations governing scenic quality, and impacts would be less than significant. (DEIR, pp. 4.1-34 through 4.1-35.)

Other Regulations Governing Scenic Quality

Chapter 22.102, Significant Ecological Areas. The Project site and surrounding adjacent area are within the Santa Susana Mountains/Simi Hills SEA. As detailed in the Biota Report (Appendix C of the DEIR), the Project site includes 664 SEA-Protected Trees within the survey area. Of the 664 SEA-Protected Trees, which include southern California black walnut, Fremont cottonwood, coast live oak, scrub oak, valley oak, red willow, arroyo willow, and blue elderberry, a total of 51 are classified as heritage trees, including 46 coast live oaks and 5 valley oaks. A total of 334 of the SEA-Protected Trees would be impacted by the Project, including 312 non-heritage trees and 22 heritage trees (Appendix C of the DEIR).

As the Project site's SEA Protected Trees currently provides aesthetic benefits such as shade and canopy coverage, removal of these trees could result in degradation of the site's existing visual quality. However, at a minimum, removal of any SEA Protected Tree would require mitigation in the form of two replacement plantings for non-heritage trees and ten replacement plantings for heritage trees, which would require 772 replacement trees to be planted. In accordance with MM-4.4-16, the required replacement trees would be planted where suitable growing conditions are present and would remain in perpetuity, growing to provide verdant canopy coverage that mimics the valued visual elements of the existing SEA Protected Trees proposed for removal. Furthermore, the Project would be required to demonstrate compliance with the requirements of Chapter 22.102 of the Zoning Code through a Burden of Proof statement detailing how the Project will meet each SEA finding. Therefore, the Project would not conflict with elements of Chapter 22.102, Significant Ecological Areas pertaining to scenic quality. (DEIR, pp. 4.1-35 through 4.1-36.)

Chapter 22.104, Hillside Management Areas. The Project site is within a HMA defined in the Zoning Code (Section 22.104) as having 25% or greater natural slopes. The Project site is also designated as Residential 2 (H2) per the

OVOV. The Project would utilize density-controlled development (per Chapter 22.140.170 of the Zoning Code). In compliance with the Hillside Design Guidelines, development would be located on the flattest portion of the Project site (Design Measure 1.2), which would allow for the preservation of contiguous open space on the southern portion of the Project site (including hillsides and a County-designated significant ridgeline), as well as improved open space and landscaped areas ribboned through the developed northern portions of the Project site. As such, the Project would not conflict with the provisions set forth in Chapter 22.104 (HMAs) or Appendix I (Hillside Design Guidelines) of the Zoning Code governing the scenic quality of hillsides. (DEIR, p. 4.1-36.)

Chapter 22.174, Oak Tree Permits. The Project would follow standard avoidance and protective measures consistent with the purpose as outlined in Chapter 22.174.010 of the Zoning Code. The Project would preserve oak trees and associated vegetation in large portions of the Project site through preserving open space areas in the southerly and westerly portions of the Project site. Oak trees and associated vegetation are considered important visual resources on the Project site. Although oak trees are proposed for removal, the Project would receive a permit to facilitate allowable removal. Further, even with the proposed removal of individual trees to accommodate proposed development, a substantial number of existing trees would remain on site (in particular, in the southern portion of the site that would not be developed) and this area would retain and convey its existing natural qualities. As such, the Project would not conflict with Chapter 22.174, Oak Tree Permits, of the Zoning Code, for the purposes of regulations governing scenic quality. (DEIR, p. 4.1-36.)

Chapter 22.140.170, Density-Controlled Development. Consistent with OVOV's direction, to avoid developing on open hillsides and other sensitive areas, the Project Applicant is requesting approval of a Density-Controlled Development CUP to allow the Project's proposed development to be clustered on approximately 41 acres of the Project site positioned proximate to the Project frontage on The Old Road and adjacent to existing development along the I-5 corridor. Through the Density-Controlled Development CUP, the Applicant will be able to preserve approximately 175 acres of the approximately 233-acre Project site as natural and improved open space, including approximately 150 acres of contiguous open space to the south, allowing the Project to visually blend into the public, undeveloped park and recreation areas to the south. The Project would comply and not conflict with the requirements of Chapter 22.140.170, Density-Controlled Development, of the Zoning Code. (DEIR, p. 4.1-37.)

2.1.5 4.1e Shadows, Light, or Glare

Impact 4.1e — Would the project create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?

Finding: Less than Significant Impact. (DEIR, pp. 4.1-37 through 4.1-40.)

Facts in Support of Finding: Construction. Due to the short-term and limited use of construction lighting (only when needed) which would not result in a substantial source of lighting or glare, the Project would not adversely affect day or nighttime views in the area, and short-term construction impacts would be less than significant.

Operation. With the Project's use of non-reflective building material and residential clustering to limit the Project's development footprint and compliance with applicable provisions of the Zoning Code, California Vehicle Code, and California Building Code, Project lighting and materials would be contained within the Project site and would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The Project would utilize a clustered development program to minimize impacts associated with the Project footprint, which would subsequently minimize the footprint of on-site lighting and light spillage onto adjacent areas,

including open space areas. Although the Project's lighting and glare impacts would be less than significant prior to mitigation, the Project would be required to comply with MM-4.4-12, Lighting Plan, which would require a lighting plan that would adhere to the Rural Outdoor Lighting District requirements. For the purposes of reducing potential biological resource impacts the lighting plan must demonstrate compliance with Chapter 22.80 of the Zoning Code. The lighting plan shall prioritize safety while minimizing environmental effects, emphasizing low, shielded lighting that avoids native habitats and prevents light spillage. The lighting shall be minimal in intensity and duration, utilizing warm sources like low-pressure sodium, high-pressure sodium, and low-color-temperature light emitting diodes, with a maximum of 2,200 Kelvins. Nevertheless, prior to mitigation, the impact associated with lighting and glare during operation would be less than significant.

As the Project site is undeveloped, there are no substantial sources of shadow on-site. In addition, the neighboring residential development to the north is, on average, at a higher elevation than the Project site, and would not be impacted by shadow cast by Project buildings. Therefore, the Project would not create a new source of substantial shadow, and impacts would be less than significant. (DEIR, pp. 4.1-37 through 4.1-40.)

2.2 Agriculture/Forest

2.2.1 4.2a Conversion of Farmland

Impact 4.2a — Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Finding: No Impact (DEIR, p. 4.2-12.)

Facts in Support of Finding: The Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as mapped by the Department of Conservation (DOC) Farmland Mapping and Monitoring Program. As such, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use and therefore, there would be no impact. (DEIR, p. 4.2-12.)

2.2.2 4.2b Zoning for Agricultural Use

Impact 4.2b — Would the project conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?

Finding: Less than Significant Impact. (DEIR, pp. 4.2-12 through 4.2-14.)

Facts in Support of Finding: With approval of the CUPs (Zoning Code Section 22.16.030 in accordance with Chapter 22.158 [CUPs]), including a density-controlled development CUP (Zoning Code Section 22.140.170), and a CUP for Townhouses within an A-2 zone (Zoning Code Section 22.140.600 [Townhouses]). and administrative housing permit, and with the Project's proposed preservation of natural open space, the Project's residential development would not conflict with existing zoning for agricultural use. Further, and as provided in Section 22.16.010(B)(1) of the Zoning Code, the Project would include approximately 150 acres of natural open space lots supporting a dedicated trail network, approximately 24 acres of HOA-maintained open space, and approximately 2.59 acres of active and passive open space areas, in accordance with permitted uses in the A-2 zones of A-2-1 and A-2-2. The Project site does not include land

under an Agricultural Resource Area (ARA) or land under a Williamson Act contract. Therefore, the Project would have less than significant impacts related to conflicts with existing zoning for agricultural use, a designated ARA or with a Williamson Act contract. (DEIR, pp. 4.2-12 through 4.2-14.)

2.2.3 4.2c Zoning for Forest Land

Impact 4.2c Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Finding: No Impact (DEIR, p. 4.2-14.)

Facts in Support of Finding: The Project site contains at least 10% native tree cover, including coast live oak, red willow, and California walnut grove forest and woodland, which provides public benefits related to aesthetics, fish and wildlife, biodiversity, water quality, and recreation. Therefore, pursuant to PRC Section 12220g, the Project site contains forest land. However, while there is forest land present on-site, the Project-site's existing zoning is agriculture (A-2-1 and A-2-2), commercial (C-3-DP and C-3), and residential (RPD 1-1.4U). Therefore, the Project site does not have land zoned for forest land, timberland, or timberland zoned Timberland Production, as defined by the PRC. Further, the Project site is not available for growing commercial tree species used to produce lumber and other forest products, including Christmas trees. Therefore, pursuant to PRC Section 4526, the Project site does not contain timberland. In addition, the Project site has not been zoned pursuant to Government Code Sections 51112 or 5113 and is therefore not considered to be a timberland production zone (TPZ), as defined in Government Code Section 51104(g).

As there is no zoning for forest land, timberland, or TPZ on site, the Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined in PRC Section 4526), or timberland zoned Timberland Production (as defined in Government Code Section 51104(g) and there would be no impact. (DEIR, p. 4.2-14.)

2.2.4 Cumulative Impacts – Agriculture/Forest

Finding: Less Than Significant Impact (DEIR, pp. 4.2-16 through 4.2-19.)

Facts in Support of Finding: Regarding cumulative impacts from conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use, impacts could occur if other cumulative projects within the unincorporated County would result in conversion of Farmland to non-agricultural use in conjunction with the Project. As no Farmland is present on the Project site, development of the Project would not contribute to the loss of Farmland within the unincorporated County.

Cumulative agriculture resource impacts regarding conflicts with existing zoning for agricultural use, with a designated ARA, or with a Williamson Act contract, could occur if other cumulative projects in the unincorporated County, in combination with the Project would result in zoning, ARA, or Williamson Act incompatibility impacts. As discussed above, there is no Prime Farmland, Farmland of Statewide Importance, or Unique Farmland present on the Project site, nor does the Project site contain any ARAs or land under a Williamson Act contract. The Project would propose development within on-site A-2 zones and FMMP Grazing Land where residential is a permitted use

and senior housing are conditionally permitted uses. With approval of applicable discretionary CUPs and an administrative housing permit, and with the Project's proposed preservation of approximately 150 acres of natural open space, the Project would not conflict with existing zoning for agricultural use, and impacts would be less than significant. As such, the Project would not contribute to a cumulatively considerable impact.

Regarding cumulative impacts from conflicts with existing zoning for or rezoning of forest land (as defined in PRC Section 12220 [g]), timberland (as defined in PRC Section 4526), or timberland zoned Timberland Production (as defined in Government Code Section 51104[g]), impacts to these forestry resources could occur if the Project, in combination with other cumulative projects within the unincorporated County would result in a cumulative impact due to conflicts with existing zoning and/or conversion of forest land, timberland, or a TPZ. The General Plan EIR did not identify any substantial, adverse cumulative impacts to forestry resources, timberland or a TPZ in the County. (DEIR, pp. 4.2-16 through 4.2-19.)

2.3 Air Quality

2.3.1 4.3c Sensitive Receptors

Impact 4.3c Would the project expose sensitive receptors to substantial pollutant concentrations?

Finding: Less Than Significant Impact (DEIR, pp. 4.3-49 and 4.3-51.)

Facts in Support of Finding: Construction. Health Effects of Carbon Monoxide concluded that CO concentrations at congested intersections would not exceed the 1-hour or 8-hour CO CAAQS unless projected daily traffic would be at least over 100,000 vehicles per day. While intersection volumes are not available for every intersection within the unincorporated County area, implementation of the Project would result in a maximum of 4,493 trips per day. The highest volume intersection (The Old Road and Pico Canyon Road) would not exceed 30,000 vehicles per day. Accordingly, it is not anticipated that the Project would result in a new congested intersection or substantially exacerbate conditions at congested intersections, nor is it anticipated that the Project would increase volume at any given intersection to more than 100,000 vehicles per day. Therefore, a CO hotspot is not anticipated to occur based on potential future residential development facilitated by the Project. Impacts associated with the potential for CO hotspots to expose sensitive receptors to substantial pollutant concentrations would be less than significant and no mitigation is required. (DEIR, p. 4.3-49.)

Operation. As the Project consists of a residential development, including recreational uses, the majority of the emissions generated during operation would be from vehicles travelling to and from the site. These vehicles are predominantly gasoline, and the majority of the emissions would be off-site. As such, the Project would not expose sensitive receptors to substantial pollutant concentrations during operations. Impacts would be less than significant during operation.

A health risk assessment (HRA) was performed to estimate the Maximum Individual Cancer Risk and Chronic Hazard Index for residential receptors as a result of emissions from I-5 on future sensitive receptors of the Project. This assessment of risk includes the accounting for time spent indoors as identified in the National Human Activity Pattern Survey (NHAPS) and the time spent away from home as recommended by Office of Environmental Health Hazard Assessment (OEHHA). Accounting for the actual time spent indoors and exposure related to the residents within the Project provides a more realistic exposure scenario from toxic air contaminants (TAC) emissions from I-5. TAC emissions (from I-5 freeway) would result in a Residential Maximum Individual Cancer Risk of 8.70 in 1 million, a Residential Chronic Hazard Index of 0.01, and a Residential Acute Hazard Index of 0.004. These impact

levels would be less than the respective SCAQMD significance thresholds. As such, impacts regarding exposure of sensitive receptors to substantial pollutant concentration during operation of the Project would be less than significant. (DEIR, p. 4.3-51.)

2.3.2 4.3d Other Emissions

Impact 4.3d — Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Finding: Less Than Significant Impact (DEIR, pp. 4.3-51 through 4.3-52.)

Facts in Support of Finding: Land uses and industrial operations associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Odors would be potentially generated from vehicles and equipment exhaust emissions during construction of the Project. Potential odors produced during construction would be attributable to construction equipment, architectural coatings, and asphalt pavement application. Such odors would disperse rapidly from the Project site and generally occur at magnitudes that would not affect substantial numbers of people. Project construction and operation would be required to comply with SCAQMD Rule 402, Nuisance, which prohibits the discharge of air pollutants from a facility that could cause injury, detriment, nuisance, or annoyance to the public or damage business or property. Therefore, impacts associated with odors during construction would be less than significant.

The Project would not include land uses that generate odors as discussed above during operation. The residences may emit odors outside during cooking or application of architectural coatings. These would be limited to the areas adjacent to the source and would not impact substantial numbers of people. These odors would also be short in nature and would disperse rapidly. Any indoor odors would be limited to that building. Therefore, Project operations would result in an odor impact that is less than significant. (DEIR, pp. 4.3-51 through 4.3-52.)

2.4 Biological Resources

2.4.1 4.4c Wetlands

Impact 4.4c — Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

Finding: Less Than Significant Impact (DEIR, p. 4.4-55.)

Facts in Support of Finding: Potential temporary indirect impacts to the South Fork of the Santa Clara River and the on-site drainages could result from construction activities and would include impacts from the generation of fugitive dust and the potential introduction of chemical pollutants (including herbicides). Excessive dust can decrease the vigor and productivity of vegetation through effects on light, penetration, photosynthesis, respiration, and transpiration; increased penetration of phytotoxic gaseous pollutants; and increased incidence of pests and diseases. Erosion and chemical pollution (releases of fuel, oil, lubricants, paints, release agents, and other construction materials) may affect wetlands/jurisdictional waters. The release of chemical pollutants can reduce the water quality downstream and degrade adjacent habitats. However, during construction, erosion-control

measures would be implemented as part of the Project's Stormwater Pollution Prevention Plan (SWPPP). Because the entirety of the Project development footprint would be graded at one time, but construction would occur over time in phases, erosion measures would need to be maintained until all graded areas are constructed/landscaped. Prior to the start of construction activities, the contractor is required to file a Permit Registration Document with the State Water Resources Control Board in order to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CAS000002) or the latest approved general permit. The required SWPPP includes best management practices (BMPs) to reduce or eliminate construction-related pollutants in runoff, including sediment, for all exposed soils. Therefore, temporary indirect impacts due to construction would be less than significant due to compliance with regulations. (DEIR, p. 4.4-55.)

2.4.2 4.4f Local Policies or Ordinances Protecting Biological Resources

Impact 4.4f

Would the project conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (County Code, Title 12, Ch. 12.36), the County Oak Tree Ordinance (County Code, Title 22, Ch. 22.174), SEAs (County Code, Title 22, Ch. 102), Specific Plans (County Code, Title 22, Ch. 22.46), Community Standards Districts (County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (County General Plan, Figure 9.3)?

Finding: Less Than Significant Impact (DEIR, pp. 4.4-61 through 4.4-62.)

Facts in Support of Finding: The Project site is located at the terminus of two main drainages that drain Lyons Canyon in the south and a small, unnamed canyon in the north, with several smaller tributaries draining minor canyons. The Project proposes to install detention basins within the western perimeter of the Project's development footprint to retain stormwater and direct Project flows into an underground stormwater system that would direct water to the same destination. Accordingly, the existing drainage patterns and hydrologic conditions remain the same and no changes to the functions of watercourses and their tributaries are caused by the Project. Ecologically, the Project would impact 2.56 acres of riparian-associated vegetation communities; however, the Project proposes to preserve a minimum of 27.47 acres off-site of similar or higher quality habitat within the Santa Susana Mountains SEA, providing a mitigation ratio of 7.6:1, which substantially exceeds the mitigation ratios for same in the SEA ordinance and implantation implementing guidelines (which require a 5:1 mitigation ratio). As such, the proposed mitigation lowers the Project's effect on ecological and hydrological functions of water bodies, watercourses, and their tributaries to less than significant.

Project development is strategically clustered adjacent to The Old Road/I-5 to the east and adjacent to existing residential and commercial development to the north. All proposed roads, access roads, driveways, and utilities are located within the Project's development footprint area, allowing approximately 62% of the Project site to be preserved as natural open space within a conservation easement. While the Project site does contain Priority Biological Resources (SEA Resource Categories 1 through 3), preservation, avoidance, and minimization measures, including on-site and off-site natural open space conservation, construction monitoring, surveys, preparation of habitat mitigation plans, and the recordation of conservation easements alongside financial support for ongoing maintenance and monitoring of open space resources serve to limit conflicts with Priority Biological Resources. The Project's on-site and off-site preservation of 593.02 acres of Category 1-4 vegetation communities adjacent to existing public lands would allow for additional Priority Biological Resources to be preserved and migratory paths to be protected in

perpetuity. As such, the Project would ensure that roads, access roads, driveways, and utilities do not conflict with Priority Biological Resources, habitat areas, or migratory paths. The Project complies with this finding.

The Project does not cause habitat fragmentation or loss of contiguity or connectivity within the SEA because the Project design clusters proposed development adjacent to existing residential and commercial uses to the north and The Old Road/I-5 on the east, allowing approximately 62% of the Project site to be dedicated as a 144.43-acre On-Site Conservation Area; the Project's "clustered development" regime is in keeping with applicable policies for same contained in the controlling Santa Clarita Valley Area Plan (aka, the OVOV). Furthermore, the Project preserves an additional 465.38 acres of category 1-4 resources within the Off-Site Conservation Area, facilitating wildlife movement and connectivity within the Santa Susana Mountains SEA in perpetuity. As such, the Project promotes the resiliency of the SEA to the greatest extent possible and would not contribute to the loss of contiguity or connectivity of the SEA. The Project complies with this finding and the impact is less than significant. (DEIR, pp. 4.4-61 through 4.4-62.)

2.4.3 4.4g Adopted Plans

Impact 4.4g — Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan?

Finding: No Impact (DEIR, p. 4.4-63.)

Facts in Support of Finding: The Project site is not within any Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state HCP. Therefore, there are no impacts to HCPs, NCCPs, or other approved local, regional, or state HCPs. (DEIR, p. 4.4-63.)

2.5 Energy

2.5.1 4.6a Wasteful Consumption

Impact 4.6a — Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Finding: Less Than Significant Impact (DEIR, pp. 4.6-13 through 4.6-22.)

Facts in Support of Finding: Construction. Temporary electric power for lighting and electronic equipment, such as computers, may be needed for construction. Natural gas is not anticipated to be required during Project construction; however, if needed, any minor amounts would be temporary and negligible and would not have an adverse effect. Nonetheless, any use of natural gas is anticipated to be sufficiently served by existing supply from Southern California Gas (SoCalGas) and would not require additional local or regional capacity. Heavy-duty equipment associated with construction would rely on diesel fuel, as would vendor trucks involved in delivery of materials to the individual parcels within the Project area and haul trucks exporting demolition material or other materials off site or importing material. Any future development facilitated by the Project would be required to adhere to all federal, State, and local requirements. Considering these requirements, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy during construction. (DEIR, pp. 4.6-13 through 4.6-16.)

Operation. Project operation would require electricity for multiple purposes including, but not limited to, building heating and cooling, water heating, lighting, appliances, and electronics. Additionally, the supply, conveyance, treatment, and distribution of water would indirectly result in electricity usage. Per Title 24, the Project is required to install solar on the residential development, which would generate electricity for Project use. However, as detailed in the DEIR (DEIR, p. 4.6-16), the quantities estimated to be used by the Project would not be wasteful, inefficient, or unnecessary during Project operation. It is anticipated that SoCalGas' existing and planned natural gas supplies would be sufficient to support the Project's demand for natural gas. During operations, the majority of fuel consumption resulting from the Project would involve the use of motor vehicles traveling to and from the Project site, as well as fuels used for alternative modes of transportation that may be used by residents. Project-related vehicle trips would also comply with Pavley Standards, which are designed to reduce vehicle greenhouse gas (GHG) emissions by mandating increasingly stringent emissions standards on new vehicles but would also result in fuel savings from more efficient engines in addition to compliance with Corporate Average Fuel Economy standards. Further, the Project is located within the study area of four local and four express Santa Clarita Transit routes. The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation, and the impact would be less than significant. (DEIR, pp. 4.6-16 through 4.6-22.)

2.5.2 4.6b Conflict with Energy Plans

Impact 4.6b Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Finding: Less Than Significant Impact (DEIR, pp. 4.6-22 through 4.6-23.)

Facts in Support of Finding: Construction. The Project's construction equipment used would be consistent with the energy standards applicable to construction equipment including limiting idling and using contractors that comply with applicable California Air Resources Board (CARB) regulatory standards that affect energy efficiency. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency regarding during Project construction and the impact is less than significant.

Operation. Because the Project would comply with Title 24, Part 6 and Part 11, the Project would not conflict with the County's OurCounty Sustainability Plan's renewable energy goals, as the local plan is consistent with existing regulations. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, operational impacts would be less than significant. (DEIR, pp. 4.6-22 through 4.6-23.)

2.5.3 Cumulative Impacts – Energy

Finding: Less Than Significant Impact (DEIR, pp. 4.6-23 through 4.6-24.)

Facts in Support of Finding: Cumulative projects that could exacerbate Project impacts include any projects that could result in wasteful, inefficient, or unnecessary use of energy. However, cumulative projects would be required by the County or City of Santa Clarita, as applicable, to conform to current federal, state, and local energy conservation standards, including the California Energy Code Building Energy Efficiency Standards (24 CCR Part 6), the California Green Building Standards Code (CALGreen) Code (24 CCR Part 11), and Senate Bill 743. As a result, the Project, in combination with other reasonably foreseeable projects, would not cause a wasteful use of energy or other non-renewable natural resources. Therefore, the energy demand and use associated with the Project and

cumulative projects would not substantially contribute to a cumulative impact on existing or proposed energy supplies or resources and would not cause a significant cumulative impact on energy resources.

The Project would not conflict with applicable plans for renewable energy as it would be required to include solar pursuant to Title 24. Further, the cumulative projects identified in the DEIR would also include residential that would be subject to the solar requirements of Title 24. As such, the Project in combination with other reasonably foreseeable projects, would not conflict with a state or local plan for renewable energy or energy efficiency and the Project's contribution would be less than significant. (DEIR, pp. 4.6-23 through 4.6-24.)

2.6 Geology and Soils

2.6.1 4.7a(i-iv) Risk of Loss, Injury or Death

Impact 4.7a(i-iv) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known active fault trace; (ii) strong seismic ground shaking; (iii) seismic related ground failure including liquefaction and lateral spreading; or (iv) landslides?

Finding: Less Than Significant Impact (DEIR, pp. 4.7-13 through 4.7-16.)

Facts in Support of Finding: Earthquake Fault/Seismic Ground Shaking. There are no Holocene-active faults that intersect or are within close proximity to the Project site and the Project site is not located within an Alquist-Priolo Earthquake Fault Zone, as defined by the California Geological Survey. The Project site is located in a seismically active area with numerous regional Holocene-active faults that are capable of causing a substantive seismic event (i.e., earthquake) which could adversely affect the Project. However, development associated with the Project would not cause or exacerbate seismic conditions. The amount of ground shaking at any one site is based on numerous factors including magnitude of the earthquake, distance to the causative fault, duration of shaking, and the underlying geotechnical properties of the site and vicinity. Prior to issuance of a building or grading permit, the Applicant would be required to submit a final design level geotechnical report that includes all seismic design specifications for site preparations and foundation design. The report would be submitted to Los Angeles County Department of Public Works (Public Works) for review and approval. Therefore, with compliance and implementation of seismic design standards as required by the latest Standard Specifications for Public Works Construction and the Los Angeles County Building Code (LACBC) and California Building Code (CBC) would minimize seismic effects and impacts would be less than significant.

Liquefaction. The potential for liquefaction is present within the alluvial portions of the Project site, and that liquefaction-induced ground settlement of up to 1.75 inches could occur if site soils were to liquefy. However, implementation of the Project would not exacerbate any liquefaction hazards that may be present. Liquefaction hazards are dependent on the underlying characteristics of the subsurface materials such as depth to groundwater and grain size and composition of cohesionless soils. Recommendations identified in the Project's Geotechnical Report include measures such as ground improvements (i.e., removal of site soils and recompacted to building code standards) and structural (i.e., foundation and floor slab construction design) measures, which would be required as part of the Project design consistent with current geotechnical engineering practices and LACBC and CBC requirements. Implementation of these recommended measures would reduce the potential for liquefaction

and associated liquefaction-induced ground failures for all proposed improvements. Therefore, adherence to LACBC and CBC requirements, as approved by the Public Works would ensure that the potential for adverse impacts related to liquefaction and other secondary seismic effects would be low, would not exacerbate existing seismic-related ground failure threats, and potential impacts associated with liquefaction would be less than significant.

Landslides. The Project site includes existing landslides and remnant debris flow deposits. The Project's Geotechnical Report and final Project design would require approval by the Public Works Geotechnical Materials Engineering Division prior to issuance of a grading permit to assure that all slope stability design measures have been appropriately incorporated into Project designs and meet the minimum thresholds for factor of safety under static and seismic conditions. Therefore, with compliance and implementation of slope stability standards as required by the latest Standard Specifications for Public Works Construction (Greenbook) and the LACBC and CBC (including Appendix J – Grading) would minimize potential for the Project to exacerbate seismically-induced landslides to a less than significant level. (DEIR, pp. 4.7-13 through 4.7-16.)

2.6.2 4.7b Soil Erosion

Impact 4.7b Would the project result in substantial soil erosion or the loss of topsoil?

Finding: Less Than Significant Impact (DEIR, pp. 4.7-17 through 4.7-18.)

Facts in Support of Finding: Construction. Construction activities associated with the Project would include substantive earthwork activities that could potentially expose soils to increased erosion or loss of topsoil especially during storm events. However, as part of the plan checking process, the County would require submittal of a SWPPP that is required to be submitted to the Los Angeles Regional Water Quality Control Board (LARWQCB) prior to construction, in adherence to the conditions set forth under the NPDES General Construction permit. The SWPPP would incorporate BMPs that include erosion control measures during construction that would reduce the potential for erosion and loss of topsoil to occur reducing impacts to less than significant during construction.

Operation. Once constructed, operation of the Project would have a more limited degree of erosion potential because the proposed improvements would reduce the amount of exposed soil susceptible to erosion. However, with adherence to drainage control requirements and LACBC and CBC code requirements, as well as planting, irrigation and rodent control requirements, the potential for erosion and loss of topsoil would be reduced to a less than significant level during operation of the Project. (DEIR, pp. 4.7-17 through 4.7-18.)

2.6.3 4.7c Unstable Geologic Unit or Soil

Impact 4.7c Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Finding: Less Than Significant Impact (DEIR, pp. 4.7-18 through 4.7-19.)

Facts in Support of Finding: With adherence to the LACBC and CBC requirements, which contain universal standards for site preparation (e.g., fill compaction standards) and grading practices, foundation design, and guidelines for the appropriate foundation design to ensure that improvements are located on stable materials and do not cause

underlying materials to become unstable, the Project would not be located on a geologic unit or soil that is unstable or would become unstable. This impact is considered less than significant. (DEIR, pp. 4.7-18 through 4.7-19.)

2.6.4 4.7d Expansive Soil

Impact 4.7d — Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Finding: Less Than Significant Impact (DEIR, p. 4.7-19.)

Facts in Support of Finding: Samples of on-site soils indicated a "very low" expansion potential. Recommendations within the Project's Geotechnical Report include measures to ensure that reuse of excavated materials and any import fill materials meet state and local building code requirements for expansion to ensure that the soils are appropriately compacted and would not be susceptible to expansion. For proposed building areas where expansive soil units are exposed, they would either be treated on-site (mixed with non-expansive soils or treated with lime) or given an appropriate foundation design (e.g., mat foundation as opposed to floor slab support) that can withstand anticipated expansion, in accordance with building code requirements. These site preparations or design measures would be included in the Project's Final Geotechnical Engineering Investigation report, which is required by LACBC and CBC. For these reasons, the potential impact related to adverse effects from expansive soils is considered less than significant. (DEIR, p. 4.7-19.)

2.6.5 4.7e Soils Supporting On-Site Wastewater Treatment Systems

Impact 4.7e — Would the project have soils incapable of adequately supporting the use of on-site wastewater treatment systems where sewers are not available for the disposal of wastewater?

Finding: No Impact (DEIR, p. 4.7-19.)

Facts in Support of Finding: The Project would not involve the use of septic tanks or alternative wastewater disposal; therefore, no impact related to soils incapable of supporting these uses would occur. (DEIR, p. 4.7-19.)

2.6.6 4.7f Hillside Management Ordinance

Impact 4.7f — Would the project conflict with the Hillside Management Area Ordinance (County Code, Title 22, Ch. 22.104)?

Finding: Less Than Significant Impact (DEIR, pp. 4.7-19 through 4.7-20.)

Facts in Support of Finding: The Project site is located within an HMA and is subject to the County's HMA Ordinance. Overall, the Project includes density-controlled development, preservation of open contiguous space, location of development on the flattest areas of the site, landscape design, and construction of connecting trails and pedestrian paseos. In total, the Project design allows for preservation of the majority of the site as open space. As a result, the Project would preserve approximately 150 acres of natural open space (approximately 64% of the

Project site) and approximately 24 acres of improved open space[1], thus fulfilling the requirement that at least 25% of the net area of the development site be provided as required open space (Chapter 22.104.050.A.2 of Zoning Code). Furthermore, all of the approximately 150 acres of natural open space would be contiguous, thus fulfilling the requirement that at least 51% of natural open space be configured into one contiguous area (Section 22.104.050.B.2 of the Zoning Code). As such, the various design measures listed above are consistent with the Hillside Design Guidelines and the HMA Ordinance (Chapter 22.104 Appendix I of the Zoning Code); therefore, the Project would not conflict with the HMA Ordinance, and the impact would be less than significant. (DEIR, pp. 4.7-19 through 4.7-20.)

2.6.7 Cumulative Impacts – Geology and Soils

Finding: Less Than Significant Impact (DEIR, pp. 4.7-21 through 4.7-24.)

Facts in Support of Finding: The geographic context of seismic hazards is a 50-mile radius of the Project site where there is a general risk of experiencing a substantive earthquake on any of the regional Holocene-active faults in the area. However, seismic risks tend to be site-specific rather than cumulative in nature because the effects are dependent on site-specific conditions and do not combine from site to site. For current and future projects, any development occurring within the County or City of Santa Clarita, including the cumulative projects detailed in the DEIR, would be subject to site development and state and local seismic construction standards and code requirements to ensure protection from substantive damage or injury in the event of a seismic event. As with the Project, cumulative projects would be subject to the same local, regional, and State regulations pertaining to seismic safety, including the CBC and LACBC or City of Santa Clarita requirements. Adherence to these existing seismic building code requirements would ensure that adverse effects related to fault rupture, ground shaking, liquefaction, and landslides is minimized and would not become cumulatively considerable.

Similar to the Project, all cumulative projects would be subject to existing regulations, policies, and plans established by the County of Los Angeles or City of Santa Clarita and RWCQB that relate to erosion control. While these regulations are primarily designed to protect water quality of receiving waters, they are also effective in minimizing soil erosion or loss of topsoil. Regulations and plans that the cumulative projects would likely be subject to include NPDES permitting and associated SWPPPs, BMPs, Standard Urban Storm Water Mitigation Plan; Water Quality Objectives for Inland Surface Waters; the County Code and LACBC; and applicable General Plan goals and policies. Additionally, as stated in the Geotechnical Report prepared for the Project, the proposed site grading would not adversely affect the geotechnical conditions on adjacent properties. Therefore, the Project, in combination with identified cumulative projects, would result in less than significant impacts related to soil erosion and loss of topsoil.

In accordance with the local building code requirements and CBC, all cumulative projects would be required to prepare and implement recommendations from a comprehensive Geotechnical Engineering Investigation report that would be conducted by a California licensed geotechnical engineer or engineering geologist that further evaluates the soils underlying each site to evaluate the potential for landslides, lateral spreading, subsidence, liquefaction or collapse and provide geotechnical engineering improvements in site preparations and/or foundation design consistent with building code requirements that ensure stability. Therefore, the cumulative impact related to unstable soils would be less than significant and not considered cumulatively considerable.

[1] As described in Section 3.2.3, Open Space and Recreation of Chapter 3.0, Project Description, of the Draft EIR, including HOA open space lots and active and passive open space areas, the total improved open space at the Project site would be 24.31 acres.

Impacts related to expansive soils tend to be site-specific rather than cumulative in nature, because hazards associated with expansive soils is solely dependent on the expansive properties of project specific underlying materials which can vary significantly over relatively short distances. As with the Project site, all of the cumulative projects would be subject to the same local, regional, and State regulations pertaining to expansive soil hazards, including the CBC and LACBC requirements, which contain universal standards for site preparation (e.g., fill compaction standards) and grading practices, foundations design, and guidelines for the appropriate foundation design to ensure that improvements are not located on expansive soils. With conformance to such regulations and implementation of Project-specific design features required in their respective geotechnical reports, cumulative impacts related to expansive soils would be less than significant and not considered cumulatively considerable.

The Project would not include the use of septic or alternative wastewater disposal systems and as a result cannot contribute to a cumulative impact. There would be no cumulative impact related to this criterion.

The geographic context for the cumulative analysis of the HMA Ordinance is unincorporated Los Angeles County, and projects within unincorporated Los Angeles County. All projects must comply with "applicable Plans, County policies, the Zoning Code and Subdivision Ordinance, Healthy design standards." In general, projects do not combine with one another to become cumulatively considerable since each project must "substantially comply" with the ordinance and compliance is dependent upon site specific conditions. Cumulative Projects within the unincorporated County would be subject to the County's HMA ordinance established within the Zoning Code and would be required to demonstrate that these projects would not conflict with the HMA-related goals and policies of the General Plan. Cumulative projects within the City of Santa Clarita are not within an HMA as designated by the County. As such, the Project in combination with the cumulative projects would not conflict with the HMA Ordinance and the impact would be less than significant and not considered cumulatively considerable. (DEIR, pp. 4.7-21 through 4.7-23.)

2.7 Hazards and Hazardous Materials

2.7.1 4.9a Routine Transport, Transport, Storage, Production, Use, or Disposal of Hazardous Materials

Impact 4.9a — Would the project create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?

Finding: Less Than Significant Impact (DEIR, pp. 4.9-14 through 4.9-15.)

Facts in Support of Finding: Construction. Earthwork and construction activities would require the use of heavy equipment and machinery and various building materials, which would require the use of hazardous substances. Construction of the Project would involve the temporary transport, storage, and use of common hazardous substances, such as gasoline, diesel fuel, lubricating oils, paint, grease, adhesives, welding gases, solvents, and vehicle and equipment-maintenance related materials. No hazardous materials would be produced or disposed on-site during construction activities. During construction activities, the commonly used hazardous substances would be transported to and from the Project site, and at the conclusion of construction, in accordance with the U.S. Environmental Protection Agency, Hazardous Materials Transportation Act, California Occupational Safety and Health Administration (Cal/OSHA), Resources Conservation and Recovery Act, Los Angeles County Fire Department (LACoFD), and Utility Notification requirements. Consequently, compliance with the existing requirements would ensure the use of construction-related hazardous materials would not

pose a significant risk to the public or environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

Operation. No hazardous materials would be produced on-site during long-term operations of the Project. Although the Project would introduce new residential land uses to the site, resulting in an increased use of commercially available hazardous materials, there is an established, comprehensive framework independent of the CEQA process, which is intended to reduce the risks associated with the use, transportation, and disposal of hazardous materials. There would be no commercial or industrial-related transport of hazardous materials to the Project site. In addition, any transport of hazardous materials and wastes are required to comply with federal laws and regulations that are monitored and enforced by the California Highway Patrol. Compliance with existing laws and regulations would ensure the use of hazardous materials during Project operation would not pose a significant risk to the public or environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant. (DEIR, pp. 4.9-14 through 4.9-15.)

2.7.2 4.9b Significant Hazard from Reasonably Foreseeable Upset and Accident Conditions

Impact 4.9b Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?

Finding: Less Than Significant Impact (DEIR, p. 4.9-19.)

Facts in Support of Finding: Operation. During Project operation, the Project would involve the use and storage of limited quantities of hazardous materials, such as fuels, paints, cleaning solutions, solvents, and chemicals for maintenance, landscaping, and swimming pools. Although these materials could potentially be harmful if not properly handled, they would be managed in accordance with strict federal, state, and local regulations, including those outlined in the California Health and Safety Code and enforced by the LACoFD. Given the relatively small quantities of hazardous materials required during Project operation and adherence to regulatory requirements, the risk of significant environmental impact or public exposure during operation is considered less than significant. (DEIR, p. 4.9-19.)

2.7.3 4.9c Hazards within One-Quarter Mile of Sensitive Land Uses

Impact 4.9c Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?

Finding: Less Than Significant Impact (DEIR, p. 4.9-20.)

Facts in Support of Finding: Operation. The Project would not include the manufacturing or industrial-scale emissions or handling of any hazardous or acutely hazardous materials, substances or waste. Although the Project would include the use, storage, transport, and disposal of limited quantities of common hazardous materials, it would be consistent with types of existing land uses in the Project area. Any transport of hazardous materials would be minor and related to activities commonplace to residential development and building maintenance and would

not involve commercial or industrial-related hazardous materials. Further, the LACoFD is the designated Certified Unified Program Agency (CUPA) and is responsible for implementing at the local level the Unified Program, which serves to coordinate the administrative requirements, permits, inspections, and enforcement activities related to hazardous materials and waste management. Therefore, operational impacts associated with hazardous emissions or use of acutely hazardous materials, substances, or waste within one-quarter mile of a sensitive land use would be less than significant. (DEIR, p. 4.9-20.)

2.7.4 4.9e Airport Land Use Plan

Impact 4.9e — For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Finding: No Impact (DEIR, p. 4.9-22.)

Facts in Support of Finding: The Project site is not located within two miles of a public airport or within an airport land use plan for any airport, and as such, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area, and there would be no impact. (DEIR, p. 4.9-22.)

2.8 Hydrology and Water Quality

2.8.1 4.10b Groundwater Supplies

Impact 4.10b — Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Finding: Less Than Significant Impact (DEIR, pp. 4.10-24 through 4.10-26.)

Facts in Support of Finding: Construction. Construction of the Project would not require the use of on-site groundwater supplies, and all water that would be required for dust suppression during construction would come from the municipal water supply. Although grading and excavation of hilltops may approach 100 feet of elevation change to create building pads, Project grading would not require deep excavation in the lower areas of the site that could potentially encounter groundwater. As such, construction of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge or otherwise impede sustainable groundwater management of the basin.

Operation. The Project would not install new groundwater wells as a water source and would strictly rely on water supplied by Santa Clarita Valley Water Agency (SCV Water). SCV Water is responsible for managing water supplies to ensure projected future demands are met through local and imported sources in addition to implementing local conservation efforts. Although the Project would result in development of impervious surfaces that would reduce infiltration, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, and the Project would not impede sustainable groundwater management of the basin, and impacts would be less than significant. (DEIR, pp. 4.10-24 through 4.10-26.)

2.8.2 4.10c(i-iv) Drainage Pattern Alteration

Impact 4.10c(i-iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on or off site; (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?

Finding: Less Than Significant Impact (DEIR, pp. 4.10-26 through 4.10-31.)

Facts in Support of Finding: Construction. The Project would require construction activities, including grading and removing vegetation, that would alter existing drainage patterns and stormwater flows within the Project site that could generate erosion, siltation on- site and off-site, which in turn could adversely affect beneficial uses of Santa Clara River Reach 6. However, the development footprint of the Project within the approximately 233-acre site would minimize impacts by clustering the approximately 83 acres of development toward the northeast portion of the site preserving approximately 150 acres of natural open space in the southerly portion of the site. Through compliance with existing regulations, the Project would not result in significant soil erosion or siltation impacts during the construction phase related to the alteration of drainage patterns, flood hazard areas, or alteration of a stream or river.

The Project would require construction activities, including grading and removing vegetation, that would alter existing drainage patterns and stormwater flows within the Project site that would increase the rate of surface flows which could contribute to flooding during construction activities. However, Project construction must be implemented in accordance with County Code- (DEIR Appendix J, Grading), which sets forth detailed requirements for site grading activities, including the requirement to submit a grading plan to the satisfaction of the County's Building Official, which must be based on an approved geotechnical report. The Project's hydrologic and hydraulic analysis determined that the proposed debris/detention basins would reduce the existing 50-year peak flow rate. A Conditional Letter of Map Revision (CLOMR) would be processed through and approved by the Federal Emergency Management Agency (FEMA) prior to the approval of storm drain plans and construction of the proposed channel and basins. Additionally, the proposed basins would remove sediment reducing the potential for sediment to impact the capacity of the downstream drainage network. Therefore, the Project would not substantially increase the rate, amount, or depth of surface runoff in a manner that could result in flooding on- or off-site, and impacts would be less than significant.

The Project would not result in substantial additional sources of polluted runoff during short-term construction activities, and as a result, would not adversely affect beneficial uses of Santa Clara River Reach 6. Additionally, the Project would not create or contribute runoff that would exceed the capacity of existing stormwater drainage systems during short-term construction because the Project site would remain pervious during grading/earthwork. A site-specific SWPPP and Erosion and Sediment Control Plans would be implemented during construction to address transport of sediment and protect properties from erosion, flooding, or the deposition of mud, debris, or

construction-related pollutants. All earthwork would be implemented in accordance with the grading permit and County Code- Appendix J, Grading, which sets forth detailed requirements for site grading activities and would ensure that stormwater flows were addressed through on-site BMPs to meet County Code requirements for hydromodification and water quality. The RCB culvert at the northwest corner of the Project site would continue to receive stormflows from the Project site during construction activities and could accommodate flows from the site, similar to the existing conditions. The Project's water quality BMPs and compliance with applicable laws and regulations would ensure that operation of the Project would not substantially degrade surface or groundwater quality, and as a result, would not adversely affect beneficial uses of Santa Clara River Reach 6. Impacts would be less than significant.

Operation. The Project site includes 27 gross acres, or approximately 12% of the Project site, within a FEMA Zone A, High Risk/Special Flood Hazard Area. The remainder of the site includes Zone D, areas where there are possible but undetermined flood hazards, and Zone X, Area of Minimal Flood Hazard. Because a portion of the proposed area of development is within Zone A, there is the potential for the Project to redirect stormwater flows that could lead to the damage or loss of structures involving flooding. To minimize risks of flood damage to housing or other structures, the Project would require substantial earthwork to develop the site in a manner to eliminate potential flood hazards associated with Zone A. In addition, areas of the site within FEMA Zone D, where there are possible but undetermined flood hazards, include hydrologic tributaries to the Zone A 100-year flood zones. As a result, the stormwater runoff contributions from these tributaries have been incorporated into the 100-year flood analysis. Therefore, Project grading would not impede or redirect flood flows which would expose existing downstream housing or other insurable structures in a federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk or loss of damage involving flooding. Impacts would be less than significant. (DEIR, pp. 4.10-26 through 4.10-31.)

Regarding substantial erosion or siltation on- or off-site during operations, the incorporation of debris basins, smaller desilting basins, stormwater drainage facilities, and compliance with regulations, operation of the Project would not substantially alter the existing drainage pattern of the site, including through alteration of a flood zone; alteration of a stream or river; or additional impervious surfaces, in a manner that would result in erosion or siltation, and associated adverse impacts to beneficial uses of Santa Clara River Reach 6. Impacts would be less than significant. (DEIR, pp. 4.10-26 through 4.10-28.)

2.8.3 4.10d 100-Year Flood Hazard

Impact 4.10d — Would the project otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas, which would require additional flood proofing and flood insurance requirements?

Finding: Less Than Significant Impact (DEIR, pp. 4.10-31 through 4.10-32.)

Facts in Support of Finding: A portion of the Project site is within a FEMA Zone A High Risk/Special Flood Hazard Area and the Project would require substantial grading and infrastructure improvements to address potential flooding hazards. Following construction, all stormwater within the Project site would be contained within the proposed debris basins and storm drains. As such, the proposed floodplain would be limited to the basin ponding areas. Based on a 100-year flood analysis completed for the Project, proposed detention basins would reduce off-site stormwater runoff flow rate to existing levels such that downstream/off-site flooding impacts would not occur. As a result, impacts would be less than significant.

A CLOMR would be processed through and approved by FEMA prior to the approval of the Project's storm drain plans and construction of the proposed channel and basins. A Letter of Map Revision would be processed through and approved by FEMA upon completion of the drainage improvements to officially revise the Flood Insurance Rate Map to remove the Project site from being within a special flood hazard area . The County's Floodway Map would also be revised in accordance with Public Works' Floodplain Management Plan requirements that includes measures to review and update flood risk hazards when new data becomes available. The County is on a cycle to update the floodplain management plan every 5 years or sooner if conditions warrant it. Upon completion of the Project, no additional flood proofing or flood insurance requirements would be required for occupants of the Project site and the impact is less than significant. (DEIR, pp. 4.10-31 through 4.10-32.)

2.8.4 4.10e Low Impact Development Ordinance

Impact 4.10e Would the project conflict with the Los Angeles County Low Impact Development Ordinance (County Code, Title 12, Ch. 12.84)?

Finding: Less Than Significant Impact (DEIR, p. 4.10-32.)

Facts in Support of Finding: All development within the County, as defined in Chapter 12.84 (Low Impact Development Standards) of Title 12 (Environmental Protection) of the County Code, must comply with the County's Low Impact Development (LID) requirements. Biofiltration water quality treatment would be utilized across the Project site, and two types of proprietary biofiltration units are proposed. The County's LID Manual requirements would be satisfied by the biofiltration units that are sized to treat 1.5 times the stormwater volume generated on-site, based on 85th percentile rainfall. The treated flows would be discharged to an existing off-site reinforced concrete box culvert in The Old Road at the northeast corner of the site ensuring the Project would not conflict with the County's LID Ordinance (County Code, Title 12, Ch. 12.84) and impacts would be less than significant. (DEIR, p. 4.10-32.)

2.8.5 4.10f On-Site Wastewater Treatment Systems

Impact 4.10f Would the project use on-site wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?

Finding: No Impact (DEIR, p. 4.10-32.)

Facts in Support of Finding: The Project would not require the use of on-site wastewater treatment systems because the Project would connect to existing wastewater infrastructure. The Project would require new on-site sewage infrastructure to convey sewage from the Project site to the Santa Clarita Valley water reclamation plants (WRPs), including the Saugus WRP and Valencia WRP. There would be no impacts associated with the use of on-site wastewater treatment systems. (DEIR, p. 4.10-32.)

2.8.6 4.10g Flood Hazard, Tsunami, or Seiche Zones

Impact 4.10g Would the project be located in flood hazard, tsunami, or seiche zones, and risk release of pollutants due to project inundation?

Finding: Less Than Significant Impact (DEIR, p. 4.10-33.)

Facts in Support of Finding: The Project site is not located near any body of water that could create a seiche that could impact the Project. The Project site is over 21 miles from the ocean and would not be subject to the risks of a tsunami. As such, the Project would not risk release of pollutants as a result of inundation by a seiche or tsunami and the impact is less than significant.

In terms of flood hazards, a portion of the Project site designated for development is within the 100-year flood zone (Zone A). To minimize risks of flood damage including release of pollutants due to inundation, the Project includes an engineered storm drainage system to collect and treat runoff from and provide flood control protection by constructing detention basins and a new flood control channel, which would reduce the flows from the Project site. The Project's drainage system would be designed to meet the County's 24-hour, 50-year Capital Flood control standards and FEMA's 24-hour, 100-year flood standards. Following construction, all stormwater within the Project site would be contained within the proposed debris basins and storm drains. As such, the proposed floodplain would be limited to the basin ponding areas. As a result, although a portion of the Project site is currently located within a 100-year flood zone, the Project would not risk release of pollutants due to Project inundation, and as a result, would not adversely affect beneficial uses of Santa Clara River Reach 6. Impacts would be less than significant. (DEIR, p. 4.10-33.)

2.8.7 4.10h Water Quality Control Plan

Impact 4.10h Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Finding: Less Than Significant Impact (DEIR, pp. 4.10-33 through 4.10-34.)

Facts in Support of Finding: Construction. The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan during construction, as the Project would be required to comply with the Construction General Permit requiring preparation and implementation of a SWPPP to control runoff from construction work sites. Implementation of BMPs including physical barriers to prevent erosion and sedimentation, construction of sedimentation basins, limitations on work periods during storm events, use of infiltration swales, protection of stockpiled materials, and a variety of other measures would substantially reduce the potential for impacts to surface water quality from occurring during construction.

Operation. During operations, the Project would be subject to the requirements of the LARWQCB Basin Plan, which is managed by the Santa Clarita Groundwater Sustainability Agency (SCVGSA). The local groundwater sustainability plan outlines sustainability criteria and management actions needed to avoid undesirable results from groundwater extraction. The Project would not install new groundwater extraction wells or otherwise adversely affect the groundwater basin. Therefore, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and construction and operational related impacts would be less than significant. (DEIR, pp. 4.10-33 through 4.10-34.)

2.8.8 Cumulative Impacts – Hydrology and Water Quality

Finding: Less Than Significant Impact (DEIR, pp. 4.10-34 through 4.10-38.)

Facts in Support of Finding: As detailed above, the Project would result in less than significant impacts for all Project-specific impacts. Similar to the Project, cumulative projects included in the DEIR would be subject to the same

regulatory requirements, as applicable depending on jurisdiction, including but not limited to NPDES Construction General Permit and its required SWPPP, the NPDES Municipal Separate Storm Sewer System (MS4) BMP requirements, Erosion and Sediment Control Plans of the County Code, FEMA, CLOMR, SCVGSA through implementation of the sustainable groundwater management plan, LARWQCB NPDES MS4 and Public Works' LID Standards Manual. Therefore, the Project would not cause or contribute to a cumulatively significant hydrology or water quality impact, or a significant impact to beneficial uses of Santa Clara River Reach 6. (DEIR, pp. 4.10-34 through 4.10-38.)

2.9 Land Use and Planning

2.9.1 4.11a Physically Divide an Established Community

Impact 4.11a Would the project physically divide an established community?

Finding: Less Than Significant Impact (DEIR, pp. 4.11-13 through 4.11-14.)

Facts in Support of Finding: Due to the location of the Project site immediately west of I-5 and south of the nearest residential community, Project implementation would not impair mobility within an existing community or physically divide an established community. The Project would preserve and enhance local roadway access to the Project site for future Project residents and the public via the widening of The Old Road and development of a formal, on-site roadway network. In addition, the Project would maintain existing pedestrian/hiking/biking/equestrian access to the non-dedicated trail network on- and off-site, which would subsequently preserve existing connectivity with the surrounding parks and open space areas. Therefore, the Project would not physically divide an established community, and the impact would be less than significant. (DEIR, pp. 4.11-13 through 4.11-14.)

2.9.2 Cumulative Impacts – Land Use and Planning

Finding: Less than Significant Impact (DEIR, pp. 4.11-68 through 4.11-70.)

Facts in Support of Finding: Regarding cumulative impacts from physically dividing an established community, land use impacts are typically site-specific and not cumulative. Development of the Project would result in a less than significant impact regarding physically dividing an established community. As such, the Project would not contribute to any cumulative significant land use impacts as other projects are implemented in the area.

Generally, land use conflicts would be related to noise, traffic, air quality, and hazards/human health and safety issues, which are discussed in the relevant sections of the DEIR. Land use conflicts are also typically site-specific and not cumulative in nature; in other words, despite the number of cumulative projects in a given area, they would not necessarily compound to create cumulative land use conflicts. Cumulative Projects SC1 through SC26 are within the City of Santa Clarita, and as such, would not be subject to County land use plans, policies, or regulations and would not contribute to a cumulatively considerable impact. The cumulative environmental effects associated with implementation of the Project have been addressed in the technical sections of the DEIR. Therefore, the Project would not make a cumulatively considerable contribution to a cumulative impact related to land use conflicts with County land use plans, policies, or regulations for the purposes of avoiding or mitigating an environmental effect, and the cumulative impact would be less than significant.

Cumulative land use impacts regarding conflict with the goals and policies of the General Plan related to HMAs or SEAs could occur if these cumulative projects would result in land use incompatibility impacts in conjunction with the impacts of the Project. As detailed above, the Project would result in less than significant impacts regarding the potential to conflict with the goals and policies of the General Plan related to HMAs and SEAs. As such, the Project would not make a cumulatively considerable contribution related to conflicts with County's HMA and SEA-related goals and policies of the General and the cumulative impact would be less than significant. (DEIR, pp. 4.11-68 through 4.11-70.)

2.10 Mineral Resources

2.10.1 4.12a Loss of a Known Mineral Resource

Impact 4.12a — Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Finding: No Impact (DEIR, pp. 4.12-7 through 4.12-8.)

Facts in Support of Finding: As mandated by the Surface Mining and Reclamation Act of 1975 (SMARA), the California State Mining and Geology Board classifies California mineral resources with the Mineral Resource Zones (MRZs) system. The Project site contains areas designated as MRZ-1 and MRZ-3. MRZ-1 is defined as areas where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence, and MRZ-3 is defined as areas containing mineral deposits, the significance of which cannot be evaluated from available data. MRZ-2 is defined as areas where adequate information indicates that significant mineral deposits are present, or where it is judged that there is a high likelihood for their presence. The Project site does not contain an MRZ-2 zone. There is one identified plugged subsurface oil well at the site, south of the Lyon Canyon (ABD) Oil/Gas Field, which was previously owned by the Sun Drilling Company, that could be considered a source of a mineral resource recovery site. The oil well was plugged and abandoned on March 11, 1961, and has been inactive since it was plugged. The oil well (drilled in January 1961) was an exploratory and was never a productive, oil-producing well before it was abandoned/plugged in February/March 1961, just months after being drilled. Therefore, the Project would not result in a loss of availability of any known significant mineral resources that would be of value to the region and the residents of the state, and there would be no impact. (DEIR, pp. 4.12-7 through 4.12-8.)

2.10.2 4.12b Loss of a Locally-Important Mineral Resource

Impact 4.12b — Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Finding: No Impact (DEIR, p. 4.12-8.)

Facts in Support of Finding: There are no known significant mineral resources present on the Project site and the Project site is not within an MRZ-2 zone. In addition, there are no producing oil resources on the Project site. Therefore, the Project would not result in a loss of availability of locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plans, and there would be no impact. (DEIR, p. 4.12-8.)

2.10.3 Cumulative Impacts – Mineral Resources

Finding: No Impact (DEIR, pp. 4.12-9 through 4.12-10.)

Facts in Support of Finding: The geographic scope of impacts associated with mineral resources generally encompasses the Project site and a 0.25-mile radius around the Project site. This scope is appropriate because of the localized nature of mineral resource impacts. The Project site, along with projects within a 0.25-mile radius, are located in an area of the County designated by DOC as MRZ-1 or MRZ-3 with little likelihood for the presence of significant mineral resources and/or in an area with unknown mineral deposits. Therefore, the Project, combined with these cumulative projects, would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. Because the Project does not contain any mineral resources that would be considered to have value to the region and/or residents of the state the Project would not have a cumulatively considerable contribution when viewed in connection with the effects of other closely related past, present and reasonably foreseeable projects thus, there would be no cumulative impact. (DEIR, pp. 4.12-9 through 4.12-10.)

2.11 Noise

2.11.1 4.13a Substantial Temporary or Permanent Increase in Ambient Noise Levels

Impact 4.13a — Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?

Finding: Less Than Significant Impact (DEIR, pp. 4.13-25 through 4.13-30.)

Facts in Support of Finding: Operation. The proposed new residences and recreational amenity uses would add a variety of operational noise-producing activities and mechanical equipment. The primary noise-generating equipment for the new development would consist of heating, ventilation, and air conditioning (HVAC) package units that would be installed outdoors; such sources are considered stationary and are evaluated below. However, with adherence to regulatory requirements, the Project would result in less than significant operational impacts. (DEIR, pp. 4.13-25 through 4.13-30.)

Noise Element Policies. Policy N 1.10 and N.1 12 require that residences be oriented away from major noise sources, and that decisions for land use adjacent to transportation facilities employ future transportation forecasts to assess noise exposure. Residences in Lot 5 would have rear yards oriented toward I-5, which maximizes the separation distance between transportation noise sources and interior living spaces, and also makes erection of a noise barrier to protect the yard areas more feasible. The transportation noise exposure analysis does employ 2030 Year traffic forecasting to assess future traffic noise exposure for Project residents. Therefore, the Project would not conflict with Policy N 1.10 and N 1.12 and the impact is less than significant (DEIR, p. 4.13-30.)

2.11.2 4.13b Groundborne Vibration

Impact 4.13b — Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Finding: Less Than Significant Impact (DEIR, pp. 4.13-30 through 4.13-31.)

Facts in Support of Finding: Construction. Adjacent existing off-site residences are no closer than approximately 110 feet from proposed construction activities where calculated maximum vibration levels from construction activities at the closest residences would be below the 0.2 inches per second (ips) peak particle velocity (PPV) threshold for damage to residential buildings, and as such, impacts due to construction would be less than significant.

Operation. Once operational, the Project would not be expected to create groundborne vibration. Mechanical systems like HVAC units are designed and manufactured to feature rotating (fans, motors) and reciprocating (compressors) components that are well-balanced with isolated vibration within or external to the equipment casings. Vibration levels from these sources would be an order of magnitude less than that of any of the construction equipment, and the minimum separation distance between new stationary equipment and off-site residences would be no less than 450 feet (four times greater than the distance used for construction equipment vibration analysis). On this basis, generation of excessive groundborne vibration impacts due to Project operation would be less than significant. (DEIR, pp. 4.13-30 through 4.13-31.)

2.11.3 4.13c Airstrips and Airports

Impact 4.13c — For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Finding: No Impact (DEIR, p. 4.13-31.)

Facts in Support of Finding: There are no private airstrips within the vicinity of the Project site. The closest airport to the Project site is the Whiteman Municipal Airport, located approximately 12 miles southeast of the Project site. Therefore, no impacts to people residing or working in the Project area associated with aviation overflight noise exposure would occur. (DEIR, p. 4.13-31.)

2.11.4 Cumulative Impacts – Noise

Finding: Less Than Significant Impact (DEIR, pp. 4.13-31 through 4.13-33.)

Facts in Support of Finding:

Regarding vibration impacts, no portion of the Project construction limits would be closer than approximately 200 feet from any of the cumulative projects. With a Project construction-related vibration contribution of no greater than 0.004 ips PPV to construction vibration levels occurring at one of the cumulative project sites, there would be a less than significant impact and the Project would not result in a cumulatively considerable contribution regarding generation of excessive groundborne vibration or groundborne noise levels.

Neither the Project nor any of the cumulative list projects is located within the vicinity of a private airstrip or within 2 miles of a public airport. The 60-65 A-Weighted decibels (dBA) Community Noise Equivalent Level noise contour associated with the closest public airport (Whiteman Municipal Airport, located approximately 12 to 13 miles southeast of the cumulative list projects) does not extend into the vicinity, and therefore noise associated with aircraft overflights for any of the cumulative projects would be less than significant, and the Project would not result in a cumulatively considerable impact. (DEIR, pp. 4.13-31 through 4.13-33.)

2.12 Population and Housing

2.12.1 4.14a Population Growth

Impact 4.14a — Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Finding: Less Than Significant Impact (DEIR, pp. 4.14-14 through 4.14-18.)

Facts in Support of Finding: Construction. Construction activities at the Project site would lead to the temporary need for construction workers, which may come from the Santa Clarita Valley, other areas of the County, or elsewhere within the Southern California Association of Governments (SCAG) region. It is possible that workers/crews may be local to the area, and that not all construction workers would have to drive long distances to work at the Project site. The Project involves fairly common construction requirements that would not require a highly specialized labor force to permanently relocate from other regions. Construction activities would include site preparation, grading, building construction, paving, and architectural coating. Because the demand for construction workers would be short-term, and because the Project site is within an urban metropolitan region with a high diversity of skilled labor, a permanent need for new workers to relocate in order to accommodate the Project's temporary construction workforce is not anticipated. As such, any changes in population, housing, or employment due to short-term construction activities would be less than significant.

Operation. Regarding operational impacts, the combination of land use designation assumptions and CUPs allows for the development of housing on the Project site, which is consistent with the Project's proposed land use designation of Residential 2 (H2). Moreover, approval of the aforementioned CUPs allowed under Section 22.16.30, Land Use Regulations for Zones A-1, A-2, O-S, R-R, and W of the County's Zoning Code would be consistent with the proposed uses on the Project site. Therefore, development of the Project site would be consistent with the allowable development under the County's General Plan and existing zoning. As such, implementation of the Project would not induce unplanned population growth in the local vicinity. (DEIR, pp. 4.14-14 through 4.14-18.)

2.12.2 4.14b Displace Existing People or Housing

Impact 4.14b — Would the project displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?

Finding: No Impact (DEIR, p. 4.14-18.)

Facts in Support of Finding: The Project is proposed on an existing undeveloped site with no known habitable structures. The Project would not result in the displacement of existing people or housing. Thus, the Project would

not displace people or housing, resulting in the need for the construction of replacement housing outside of the Project site's boundaries. No impact would occur. (DEIR, p. 4.14-18.)

2.12.3 Cumulative Impacts – Population and Housing

Finding: No Impact (DEIR, pp. 4.14-18 through 4.14-19.)

Facts in Support of Finding: The Project would contribute to approximately 1.05% of the projected housing growth and 1.33% of the anticipated population growth for the Santa Clarita Valley Planning Area in 2035. As such, the Project's contribution to population and housing projections is nominal. Moreover, implementation of the proposed Project is an allowable use, conditionally permitted under the County's Zoning Code. The Project would not require a General Plan Amendment or Zone Change. As such, the Project is an assumed land use for the Project site, which would have been accounted for in County-wide and regional forecasts. Additionally, given the nominal representation of the County's regional projections, the Project would not exceed the Santa Clarita Valley Planning Area's approximately 77,155 housing units or 237,638 population buildout projections. Therefore, the Project would not result in substantial unplanned population growth. Additionally, the Project is anticipated to result in a nominal addition of jobs relative to the County's buildout projections for the Santa Clarita Valley Planning Area. Given this, the Project would not result in a cumulatively considerable impact relative to substantial unplanned growth. The Project would result in no impacts regarding the potential to displace existing people or housing. As such, the Project would not result in a cumulatively considerable impact. No cumulative impact would occur. (DEIR, pp. 4.14-18 through 4.14-19.)

2.13 Public Services

2.13.1 4.15a(ii) Sheriff Protection

Impact 4.15a(ii) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: sheriff protection?

Finding: Less Than Significant Impact (DEIR, pp. 4.15-35 through 4.15-36.)

Facts in Support of Finding: Operation. Over the long term, the Project would introduce new residents to the Santa Clarita Valley Sheriff Station's service area. However, the LASD has recently completed a new station and has not indicated that additional facilities are needed. Future staffing adjustments would be funded through developer fees (County Zoning Code Section 22.266). With lighting, landscaping, and other Crime Prevention Through Environmental Design measures in place, the Project would not require construction of new or expanded sheriff facilities and impacts on sheriff protection would be less than significant.

2.13.2 4.15a(iii) Schools

Impact 4.15a(iii) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental

facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: schools?

Finding: Less Than Significant Impact (DEIR, pp. 4.15-37 through 4.15-38.)

Facts in Support of Finding: Operation. The Project would result in 510 dwelling units, including 462 units (253 single family detached units and 209 single family attached units) that would be likely to house elementary, junior high and/or high school aged residents, which would increase the student population within the assigned local schools. The Project site is located within the Newhall School District for elementary school and the William S. Hart Union High School District for both junior high school and high school. Future students would attend Pico Canyon Elementary School, Rancho Pico Junior High School, and West Rancho High School.

School districts impose fees on new residential and commercial development to compensate for the impact that a project would have on existing school facilities or services, as set forth in SB 50 and Section 65996 of the California Government Code. The Project would be required to pay fees to both affected school districts, as set forth in the development fee program outlined in the Newhall School District and the William S. Hart Union High School District School Facilities Need Analyses.

Payment of the required school districts' development impact fees would ensure that impacts to service capacities of schools would be less than significant. The number of students generated by the Project would not necessitate construction of any new or expanded school facilities to maintain desired levels of service and thus would not result in adverse environmental effects. In addition, payment of SB 50 fees by the Project Applicant is considered by the State to represent full mitigation to all potential impacts to school services and facilities. The impact of the Project with respect to schools during operation would be less than significant.

2.13.3 4.15a(iv) Parks

Impact 4.15a(iv) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: parks?

Finding: Less Than Significant Impact (DEIR, pp. 4.15-39 through 4.15-41.)

Facts in Support of Finding: Operation. During operation, the Project would add 510 residential units but also dedicate approximately 150 acres of open space and trails, a recreation center, and additional HOA-maintained amenities. These on-site features would reduce any potential strain on nearby parks (e.g., Ed Davis Park in Towsley Canyon or Rivendale Park), which are part of an area classified as having a "very low" park need in the 2016 Countywide Comprehensive Parks & Recreation Needs Assessment. Any impacts to parks would be further offset by the Project's compliance with in-lieu fees under the County's Quimby Code. Therefore, impacts to parks during Project operation would be less than significant.

2.13.4 4.15a(v) Libraries

Impact 4.15a(v) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: libraries?

Finding: Less Than Significant Impact (DEIR, pp. 4.15-41 through 4.15-42.)

Facts in Support of Finding: Construction. During Project construction, there would be a temporary increase in construction workers at the Project site. Some of these construction workers are expected to currently reside in the area and, therefore, would not place additional pressure on existing library facilities. Generally, any increase in demand for library facilities is anticipated to be negligible because construction workers are highly transient in their work location and likely would use libraries near their place of residence. Although there is a small potential for construction workers to use library facilities, any resulting increase in the use of these facilities would be temporary. Therefore, construction workers are not expected to increase demand on existing library facilities to a meaningful extent. As a result, the temporary impact on library facilities during construction would be less than significant.

Operation. Future residential and nonresidential development associated with the Project would be required to pay the Los Angeles County Library's (LACL) special tax rate of $34.54 per parcel for the 2024-25 fiscal year, which may increase annually. In an effort to minimize the impact of residential projects on library services, LACL also collects a one-time library facilities mitigation fee (County Code Section 22.264.050 [Library Facilities Mitigation Fee]) at the time building permits are requested for all new residential dwelling units located within unincorporated areas of the County. The current developer fee rate for the Santa Clarita Valley's unincorporated area is $1,182 per dwelling unit. Payment of the required Library Facilities Mitigation Fee would ensure that the Project's impact on the library system would be less than significant. Therefore, impacts related to the Project's potential to create capacity of service level problems or result in substantial adverse physical impacts for library facilities would be less than significant. (DEIR, pp. 4.15-41 through 4.15-42.)

2.13.5 4.15a(vi) Other Public Facilities

Impact 4.15a(vi) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: parks?

Finding: Less Than Significant Impact (DEIR, pp. 4.15-43 through 4.15-44.)

Facts in Support of Finding: Operation. Other public facilities include nearby regional trails (the Santa Clara River Trail and the Rim of the Valley Trail) and local dedicated trails (the Taylor Trail, Towsley Trail, Wiley Canyon Trail, and Don Mullally Trail). Once operational, the Project would improve trail connectivity by dedicating on-site multi-use trails (per DPR's Santa Susana Mountains Trails Master Plan) and linking to existing non-dedicated off-site trails. Because these improvements are included in the Project's design and no off-site expansion is required, the Project

would not create capacity or service-level problems for regional or local trail systems and the impact is less than significant. (DEIR, pp. 4.15-43 through 4.15-44.)

2.14 Recreation

2.14.1 4.16a Increased Use of Facilities

Impact 4.16a — Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Finding: Less Than Significant Impact (DEIR, pp. 4.16-14 through 4.16-16.)

Facts in Support of Finding: The Project would add 1,785 new residents to a vacant site which could increase use of existing neighborhood or regional parks or other recreational facilities. In the local vicinity there are a multitude of existing neighborhood and regional parks or other recreational facilities. The Project includes designated natural open space, improved open space for active and passive use, and other recreational amenities (e.g., recreation center and a multi-use trail system). The proposed on-site recreation amenities and parks would ensure that the Project would not result in, or accelerate, substantial physical deterioration of other existing neighborhood or regional parks or recreational facilities. The Project's proposed trails, open spaces, and recreation center, and the required payment of in lieu fees to the County ensure that the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated and the impact would be less than significant. (DEIR, pp. 4.16-14 through 4.16-16.)

2.14.2 4.16b Construction or Expansion of Facilities

Impact 4.16b — Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?

Finding: Less Than Significant Impact (DEIR, pp. 4.16-16 through 4.16-17.)

Facts in Support of Finding: The Project includes designated natural open space, improved open space for active and passive use, and other recreational amenities (e.g., recreation center and a multi-use trail system). The Project site is within Study Area #49, which is above the County's average for park acreage per resident. With implementation of the Project, Study Area #49 would continue to have an abundance of park space/acres per resident in excess of the County's average ratio. Additionally, the Project site would provide 150 acres of natural open space, a 1.1-acre recreation center, and on-site trails. The construction of these facilities is part of the design of the Project, and therefore analyzed throughout the DEIR. As such, this would not have an adverse physical effect on the environment beyond what is disclosed in the DEIR. Therefore, impacts related to the inclusion of neighborhood and regional parks, other recreational facilities, or the required construction or expansion of such facilities, which might have an adverse physical effect on the environment, would be less than significant. (DEIR, pp. 4.16-16 through 4.16-17.)

2.14.3 4.16c Trail Connectivity

Impact 4.16c Would the project interfere with regional trail connectivity?

Finding: Less Than Significant Impact (DEIR, pp. 4.16-17 through 4.16-19.)

Facts in Support of Finding: With Project implementation, the inclusion of on-site open space with dedicated trails would serve to provide important missing linkages in the existing dedicated trail network within the Santa Clarita Valley and would expand trail facilities consistent with the objectives of the Santa Susana Trails Master Plan. As such, the Project would improve regional trail connectivity by increasing public recreational access, through an on-site trail system, which would provide trail connections that would ultimately connect to the Rim of the Valley Trail and Santa Clara River Trail, thereby providing regional trail connectivity in the region and supporting the goals and policies of the Santa Susana Mountains Trails Master Plan. The Project would provide a comprehensive trail network, including a publicly accessible trailhead, that would provide connections to access existing open space areas and established trails, thereby supporting the goals of Los Angeles County Department of Parks and Recreation (DPR) for regional trail connectivity. Therefore, impacts regarding regional trail connectivity would be less than significant. (DEIR, pp. 4.16-17 through 4.16-19.)

2.14.4 Cumulative Impacts – Recreation

Finding: Less Than Significant Impact (DEIR, pp. 4.16-19 through 4.16-20.)

Facts in Support of Finding: The residents in the Santa Clarita Valley Planning Area would have access to number of parks and parkland which would alleviate park pressure to any one facility. Additionally, the Project would result in less than significant impacts regarding the increased use of existing neighborhood and regional parks or other recreational facilities. Therefore, implementation of the Project would not be anticipated to result in occurrence or acceleration of substantial physical deterioration of existing neighborhood and regional parks or other recreational facilities. In addition, new residential development with subdivisions within the Santa Clarita Valley Planning Area, many of which are included Cumulative Projects LA1 through LA14 and SC1 through SC26 would be required to donate parkland and/or pay in-lieu fees for parks pursuant to the Quimby Act. Several of the Cumulative Projects include on-site open space and recreational/park components that would alleviate potential exacerbation of use on existing recreational facilities. The Project along with past, present, and reasonably future projects, would not result in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. As such, cumulative impacts to existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated, would be less than significant and would not be cumulatively considerable.

New residential subdivisions within the Santa Clarita Valley Planning Area, including Cumulative Projects, would be required to donate parkland and/or pay in-lieu fees for parks pursuant to the Quimby Act. Pursuant to the Quimby Act requirements, and the lack of construction or expansion of neighborhood and regional parks or other recreational facilities for the Project or Cumulative Projects, cumulative impacts related to the inclusion of neighborhood and regional parks or other recreational facilities or construction or expansion of recreational facilities which might have an adverse physical effect on the environment would be less than significant, and would not result in a cumulatively considerable impact.

The Project would result in a less than significant impact regarding inference with regional trail connectivity. Similar to the Project, Cumulative Project LA1 would preserve a majority of its site for open space and be required to obtain approval of a density-controlled development CUP, and of its approximately 94-acre proposed project site, approximately 75 acres in the northeastern and southern portions of the site would remain in a natural state (OPR 2019). The preservation of natural open space on-site at the Project and Cumulative Projects is relevant to regional trail connectivity in that it would not be a physical barrier for regional trail connectivity. Additionally, several Cumulative Projects west of I-5, including Cumulative Projects LA1 through LA12, contain preserved open space on-site, which would reduce impacts to regional trail connectivity within the respective Cumulative Projects. Therefore, the Project, in combination with the Cumulative Projects, would not interfere with regional trail connectivity. Cumulative impacts to regional trail connectivity would be less than significant and would not be cumulatively considerable. (DEIR, pp. 4.16-19 through 4.16-20.)

2.15 Transportation

2.15.1 4.17c Hazards Due to a Road Design Feature

Impact 4.17c — Would the project substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?

Finding: Less Than Significant Impact (DEIR, pp. 4.17-25 through 4.17-26.)

Facts in Support of Finding: Operation. Vehicular access to the Project site would be provided directly from The Old Road via two ingress/egress unsignalized driveways at the north and south and would serve as the primary Project site entrances. Neither driveway would trigger a signal warrant analysis and would not substantially increase hazards due to the establishment of new driveways. In addition, Project access and circulation has been reviewed by Public Works with respect to Caltrans/County standards to ensure that the Project does not substantially increase hazards due to a design feature. The County would also periodically review traffic operations in the Project vicinity once the Project is operational to ensure that traffic operations are satisfactory. Thus, operational impacts would be less than significant. (DEIR, pp. 4.17-25 through 4.17-26.)

2.16 Utilities and Service Systems

2.16.1 4.19a Relocation or Construction of Utilities

Impact 4.19a — Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

Finding: Less Than Significant Impact (DEIR, pp. 4.19-19 through 4.19-24.)

Facts in Support of Finding: The Project would require on-site and off-site construction of new or expanded utilities services.

Water Facilities-Construction. Grading and construction would include spraying with water trucks for soil compaction and dust suppression. Water would be provided by SCV Water for such purposes. During grading and construction, water would be stored in standard 10,000-gallon portable water tanks that can be accessed by water trucks. For a grading project the size of this Project, two 10,000-gallon portable water tanks would likely be used. The amount of water required for soil compaction and dust suppression during grading is highly variable, depending on the soil moisture at the time of grading. Assuming the soils are very dry at the time of grading, approximately 10 to 12 gallons of water would be required for each cubic yard of soil moved during grading. Assuming 4,150,000 cubic yards of grading, including over excavation and recompaction, approximately 41,500,000 to 49,800,000 gallons of water, or 127 to 152 acre-feet (AF) of water would be required for the duration of Project grading. In addition, approximately 80,000 gallons, or 0.25 AF, of water would be required for dust suppression during grading of the entire Project site. Temporary installation and operation of the portable water tanks would result in soil disturbance, which in turn could result in wind- and water-induced soil erosion and off-site sedimentation of downstream drainages, including Lyons Creek. However, in accordance with the Construction General Permit, a SWPPP, describing BMPs the discharger would use to protect stormwater runoff from sediment and erosion, would be implemented. Additionally, the Project would be required to comply with SCAQMD Rule 403 for watering requirements during construction, which would reduce associated fugitive dust and potential soil erosion during construction activities. As a result of complying with current regulations, impacts would be less than significant, and no mitigation is required. (DEIR, pp. 4.19-19 through 4.19-20.)

Operation. On-site water infrastructure would include new water meters and connections, as well as installation of new water mains and water laterals throughout the Project site. These water lines would provide domestic water, fire-fighting water, and potable irrigation water to the Project. A new water tank would be installed at the Project site to assure a reliable fire flow water pressure for the Project uses on-site. The estimated storage capacity of the water tank would be up to 2 million gallons of water. A private access road would be constructed up the slope to the tank. The water tank would be surrounded by natural and homeowners' association-managed open space at the Project site. In addition, in coordination with SCV Water, the Project would require various off-site water infrastructure improvements to service the Project site. There is potential for creep and surficial slope erosion along the proposed water tank access road, which could eventually progress to the south where it could adversely affect the proposed road. However, implementation of the five cast-in-drilled-hole soldier piles (concrete reinforcements), installed to depths of about 30 feet, or as an alternative, a stability fill with back drains along the access road, would ensure that slope stability consistent with building code requirements would occur in this location. Recommendations from the Geotechnical Report (Appendix E-1 of the DEIR) would be included as part of the Final Geotechnical Engineering Investigation Report and the geotechnical slope stability design measures (e.g., slope inclinations, fill compaction, and drainage improvements) implemented in accordance with LACBC and CBC requirements, as approved by Public Works. As a result, construction of the proposed water tank and associated access road would not cause significant environmental effects. Installation of new water mains, on- and off-site, as well as on-site water laterals, would consist of either trenching to the depth of pipe placement or using a variety of different trenchless technology, which causes substantially less ground disturbance. Trenching results in a temporary stockpiling of soil along the length of the trench, pending backfilling, which could result in potential short-term soil erosion. Similarly, construction of the off-site infrastructure improvements within the Newhall service district would result in temporary ground disturbance and potential erosion, use of construction equipment, and generation of temporary construction noise. In accordance with the Construction General Permit, a SWPPP, which describes BMPs required to protect stormwater runoff from sediment and erosion, would be implemented. Additionally, the Project would be required to comply with SCAQMD Rule 403 for watering requirements during construction, which would reduce associated fugitive dust and potential soil erosion during construction activities.

As a result of complying with current regulations, adverse impacts associated with new water infrastructure would be less than significant. (DEIR, pp. 4.19-20 through 4.19-21.)

Wastewater Facilities- Wastewater Conveyance.. Based on the Sewer Area Study for the Project (Appendix L-4 of the DEIR) and Addendum to Hydraulic Analysis and Sewer Area Study (Appendix L-5 of the DEIR), all sewer pipelines 15-inch or greater meet the capacity criteria of less than 75% full during Project operations. However, not all of the existing 8-inch lines are sufficient to meet anticipated wastewater flows and would therefore be upgraded by the Applicant to a 10-inch line as part of the Project. In addition, a 400-foot section of new sewer would be installed by the Applicant in The Old Road, between the Project site and the existing sewer main. Wastewater flow from the Project would proceed through the County-owned 10-inch pipe to existing Manhole #14, at which point the wastewater would flow through existing 10- to 18-inch pipe owned by the City of Santa Clarita, before discharging into the 24-inch Valencia Trunk Sewer, which has a capacity of 5.3 million gallons per day (mgd). Based on correspondence with Los Angeles County Sanitation District (LACSD), adequate sewer capacity would be available to serve the Project (See Appendix L-6 of the DEIR). As a result of complying with current regulations, adverse impacts associated with new water infrastructure would be less than significant. (DEIR, pp. 4.19-21 through 4.19-22.)

Wastewater Treatment. Based on a Santa Clarita Valley Sanitation District (SCVSD) will-serve letter for the Project, included as Appendix L-6 of the DEIR, the SCVSD has sufficient capacity to accommodate wastewater flows from the Project, assuming 510 residential units and a recreation center. The Project will-serve letter does not constitute a guarantee of wastewater service, but advises the Project Applicant that the SCVSD intends to provide wastewater treatment service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the SCVSD's facilities (Appendix L-6 of the DEIR). The will-serve letter does not indicate the need for any proposed expansion of the SCVSD's facilities. In the event that increased wastewater treatment capacity is necessary to accommodate discharge from the Project, the mechanism that is used to fund expansion of the treatment system is the LACSD's Connection Fee Program. In addition, considering the available treatment capacity of the SCVJSS is 9.1 mgd, the expected Project wastewater flow of 0.1 mgd would constitute 1.0% of that available capacity. Based on this small percentage, the Project would not result in the relocation or construction of a wastewater treatment facility, the relocation or construction of which would cause significant environmental impacts. Impacts would be less than significant, and no mitigation is required. (DEIR, pp. 4.19-22 through 4.19-23.)

Stormwater Drainage. The new development would permanently alter drainage courses within the northeastern portion of the Project site. The final stormwater management for the Project would be designed to reduce the post-construction peak flow rates and volumes to be less than or equal to the pre-construction peak runoff rates and volumes, for the 25-year, 50-year, and 100-year design storm. The Project would not result in expansion of any existing off-site storm water drainage facilities or in the construction or relocation of new off-site storm water drainage facilities. Similarly, construction of the on-site stormwater infrastructure and the connection to the existing box culvert at The Old Road would be completed in accordance with the Construction General Permit. The Project would also be required to comply with SCAQMD Rule 403 for watering requirements during construction. As a result of complying with current regulations, impacts would be less than significant, and no mitigation is required. (DEIR, pp. 4.19-23 through 4.19-24.)

Electric Power. Existing on-site above-ground electrical lines, including those for an existing billboard, would either be buried underground or removed. Upgrades would be confined to on-site electrical transformers and electric line connections. Transformers would either be installed above-ground or underground. The latter would require soil excavations and recompaction. The electric line connections would likely be completed by either trenchless

technology or completion of open trenching, to the depth of the underground electrical lines. The construction of the power lines would be temporary and would be subject to all applicable regulatory requirements. Installation of the on-site electrical infrastructure would be completed in accordance with the Construction General Permit. The Project would also be required to comply with SCAQMD Rule 403 for watering requirements during construction. As a result of complying with current regulations, adverse impacts associated with new and expanded electrical infrastructure would be less than significant. (DEIR, p. 4.19-24.)

Natural Gas. The Project would not have natural gas use on-site and would reduce energy-related operational greenhouse gas emissions by replacing natural gas uses with electricity. Electricity is a less greenhouse gas-intensive power source that also has the potential to be provided by renewable, zero-emission sources. As a result, the Project would not result in the relocation or construction of natural gas facilities, the relocation or construction of which would cause significant environmental impacts. No impact would occur. (DEIR, p. 4.19-24.)

Telecommunication. Extensions of existing telecommunication infrastructure into the Project site would be obtained from existing lines within The Old Road right-of-way. Upgrades would be confined to on-site connections and would likely be completed by either trenchless technology or completion of open trenching, to the depth of the underground telecommunication lines. Installation of the on-site telecommunication infrastructure would be completed in accordance with the Construction General Permit. The Project would be required to comply with SCAQMD Rule 403 for watering requirements during construction, which would reduce associated fugitive dust and potential soil erosion during construction activities. As a result of complying with current regulations, adverse impacts associated with expanded telecommunication infrastructure would be less than significant. (DEIR, p. 4.19-24.)

With adherence to regulatory requirements, the Project would result in less than significant impacts regarding the potential to cause significant environmental effects from the construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities. (DEIR, p. 4.19-19 through 4.19-24.)

2.16.2 4.19b Water Supplies

Impact 4.19b — Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Finding: Less Than Significant Impact (DEIR, pp. 4.19-25 through 4.19-28.)

Facts in Support of Finding: Construction. Grading and construction would include spraying with water trucks for soil compaction and dust suppression. Water would be provided by SCV Water for such purposes. During grading and construction, water would be stored in standard 10,000-gallon portable water tanks that can be accessed by water trucks. For a grading project the size of the Proposed Project, approximately 127 to 152 AF of water would be required for soil compaction and dust suppression during grading of the entire Project site. Construction of the Project is anticipated to begin in the second quarter of 2025 and end in the fourth quarter of 2029, for a total duration of approximately 4 years and 6 months. Construction and operations of the Project would overlap. For example, dwelling units in Lots 7, 8, and 9 (first residential lots to be constructed) would be operational during the construction of other phases. As a result, combined construction and operations water demand may be temporarily higher than the projected construction water demand of 127 to 152 AF. However, the grading related water demand of 127 to 152 AF is very conservative and the combined construction and partial operational water demand would be less than the projected operations water demand at full build-out. As a result, Project construction would have

sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant, and no mitigation is required.

Operation. The Project's anticipated population would not exceed SCAG's population growth projections for the Santa Clarita Valley Planning Area, and therefore, the Project is included within demand projections included in the 2020 Urban Water Management Plan. The water demand for Project operations would be approximately 228 AF per year to 242 AF per year. The total projected water supplies available to the SCV Water service area over the 30-year projection during normal, single-dry, and multiple-dry year (five year drought) periods are sufficient to meet the projected demands associated with the Project, in addition to existing and other planned future uses, including agricultural and industrial uses, throughout the Santa Clarita Valley, during construction and operations of the Project. Therefore, the impact is less than significant. (DEIR, pp. 4.19-25 through 4.19-28.)

2.16.3 4.19c Wastewater Capacity

Impact 4.19c — Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Finding: Less Than Significant Impact (DEIR, pp. 4.19-28 through 4.19-29.)

Facts in Support of Finding:. Based on a will-serve letter provided by the SCVSD for the Project, the SCVSD has sufficient capacity to accommodate wastewater flows from the Project, assuming 510 residential units and a recreation center. The Project's proposed population growth would represent 1.32% of the anticipated population growth for the Santa Clarita Valley Planning Area in 2035. As such, the Project's anticipated population growth would not exceed SCAG's population growth projections for the Santa Clarita Valley Planning Area. Based on this small percentage and the will-serve letter, the SCVSD would have adequate capacity to serve the Project's projected demand for wastewater treatment in addition to the provider's existing commitments. Impacts would be less than significant. (DEIR, pp. 4.19-28 through 4.19-29.)

2.16.4 4.19d Solid Waste Generation

Impact 4.19d — Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Finding: Less Than Significant Impact (DEIR, pp. 4.19-29 through 4.19-31.)

Facts in Support of Finding: Construction. Construction of the Project would result in the generation of solid waste such as scrap lumber, concrete, residual waste, packing materials, and plastics. Per CALGreen and the County Green Building Standards Code, 65% of construction and demolition waste must be diverted from landfills. As such, at least 65% of all construction debris from the site would be diverted. The remaining 35% of construction material that is not required to be recycled would either be disposed of or voluntarily recycled at a solid waste facility with available capacity. The only permitted inert landfill in the County (Azusa Land Reclamation landfill) has a maximum permitted daily capacity of 8,000 tons of waste, a remaining capacity of 51,512,201 cubic yards (25,756,100 tons) and is expected to remain open until 2045. There are other facilities that process, recycle, and transfer inert waste and other construction and demolition waste in the County. Project construction debris requiring disposal at an inert waste

landfill would be sufficiently accommodated by the existing landfill. As a result, Project construction would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

Operation. Once completed, solid waste generated by the Project would be disposed of at either Sunshine Canyon or Chiquita Canyon landfill. The net increase in solid waste that is anticipated to be produced by the Project would equate to approximately 0.0007% of the combined available capacity of Sunshine Canyon and Chiquita Canyon landfills, through the estimated closure dates, per year. As such, the Project's solid waste generation would be minimal to negligible relative to available landfill capacity relative to existing and future solid waste generation in the region. As such, the landfills that would serve the Project are anticipated to have adequate capacity to accommodate the waste disposal needs of the Project, and impacts would be less than significant. (DEIR, pp. 4.19-29 through 4.19-31.)

2.16.5 4.19e Solid Waste Requirements

Impact 4.19e — Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Finding: Less Than Significant Impact (DEIR, p. 4.19-31.)

Facts in Support of Finding: As a result of Project compliance with state and local management and reduction statutes and regulations related to solid waste, impacts are considered less than significant. (DEIR, p. 4.19-31.)

2.16.6 Cumulative Impacts – Utilities and Service Systems

Finding: Less Than Significant Impact (DEIR, pp. 4.19-31 through 4.19-36.)

Facts in Support of Finding: The Project would be required to comply with all applicable regulatory requirements, which would result in less than significant Project-specific impacts regarding the construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. Similarly, all cumulative projects would be required to comply with applicable regulations. The Project would not result in a cumulatively considerable impact and no mitigation measures are required.

Since the Project density is consistent with the County General Plan growth assumptions, the Project is included within demand projections included in the 2020 Urban Water Management Plan (UWMP). Based on the Project's Water Supply Assessment (WSA), the Project's total projected water demand was accounted for in the 2020 UWMP because the timing of the Project places it within the time frame for calculating "planned future uses" within the UWMP. As a result, the Project would not contribute to a significant cumulative impact. In addition, the Project WSA and WSA Addendum conclude that the total projected water supplies available to the SCV Water service area over the 30-year projection during normal, single-dry, and multiple-dry year (five-year drought) periods are sufficient to meet the projected demands associated with the Project, in addition to existing and other planned future uses, including agricultural and industrial uses, throughout the Santa Clarita Valley. As a result, impacts associated with the Project, in combination with Cumulative Project development, would not be cumulatively considerable. Cumulative impacts would be less than significant, and no mitigation is required.

The Project is within population and employment growth projections that have been identified by SCAG. No General Plan Amendment or zone change is required with implementation of this Project. So long as Cumulative Projects fall within these projections, existing wastewater treatment facilities have been planned to accommodate commensurate increases in wastewater generation across the region. Because the wastewater treatment plants that would serve the Project and many of the Cumulative Projects are subject to existing permits, because the Project and Cumulative Projects would be required to pay development fees that fund updates to wastewater facilities, and because the Project falls within regional growth projections, impacts would not be cumulatively considerable with respect to capacity of wastewater treatment facilities.

As a result of Project and Cumulative Project compliance with federal, state, and local management and reduction statutes and regulations related to solid waste, cumulative impacts would not be cumulatively considerable. Impacts are considered less than significant, and no mitigation is required. (DEIR, pp. 4.19-31 through 4.19-36.)

2.17 Wildfire

2.17.1 4.20d Significant Risks as a Result of Runoff, Post-Fire Slope Instability, or Drainage Changes

Impact 4.20d — Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Finding: Less Than Significant Impact (DEIR, pp. 4.20-48 through 4.20-50.)

Facts in Support of Finding: Construction. Due to the Project's hilly terrain, previous fires in the area, and its location in a Wildland-Urban Interface, there is potential for post-fire slope instability, debris flows, and flooding that could threaten people or structures. However, construction activities must follow the recommendations in the Project-specific Geotechnical Report and comply with County grading regulations to remove unstable soils and replace them with engineered fill, thereby stabilizing slopes. Impacts associated with downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes due to project construction would be less than significant. (DEIR, pp. 4.20-48 through 4.20-50.)

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3 Findings Regarding Project Environmental Effects Determined to be Less than Significant with Mitigation Incorporated

The following potentially significant impacts were analyzed in the EIR, and the effects of the Project were considered. Because of the environmental analysis of the Project, compliance with existing laws, codes, and statutes, and the identification and incorporation of feasible mitigation measures, the following potentially significant impacts have been determined by the County to be reduced to a level of less than significant; and the County has found - in accordance with CEQA Section 21081(a)(1) and the State Guidelines Section 15091(a)(1) - that "changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment." The County has determined - pursuant to PRC Section 21081(a)(2) and State Guidelines Section 15091(a)(2) - that "those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency." The County's findings are referred to herein as "Findings 2."

In the analysis provided in Sections 2 and 3, in the instance where there is no header specifying "construction" or "operation," the EIR analysis was conducted without segregation into separate construction and operational categories, or the impact was determined to be less than significant with mitigation, and as such, is included under Section 2, Findings Regarding Project Environmental Effects Determined to Have No Impact or a Less than Significant on the Environment. For example, regarding instances where there is no header within either Section 2 or 3, compatibility or consistency with plans, guidance documents, or regulations generally applies to operations, but could sometimes apply to construction. Therefore, no specific operation or construction headers are included for those impacts.

3.1 Aesthetics

3.1.1 4.1a Scenic Vista

Impact 4.1a Would the project have a substantial adverse effect on a scenic vista?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.1-19 through 4.1-23.)

Facts in Support of Finding: Construction. Scenic vistas are available from Taylor Trail, Don Mullally Trail, and I-5. These vistas include on-site and site-adjacent visual resources such as woodlands, hillside and valley terrain, and significant ridgelines, as well as distant views that stretch to the regional mountains and ridgelines of the Santa Susana Mountains and Simi Hills to the south and the Angeles National Forest ridgelines to the northeast. However, due to the mobile nature of viewers and dynamic quality of the scenic vistas available to motorists, elevation differences, intervening topography and vegetation, avoidance of construction activity or equipment on significant ridgelines, concentration of construction activity and equipment on the northern/northwestern portion of the Project site, lack of long-range nighttime scenic vistas, lack of smog-related-impacts, primary use of low vertical profile

construction equipment, limited duration of construction activities, and the presence of existing urban viewshed elements (including buildings and occasional construction and maintenance activities), impacts would be potentially significant. In order to address potentially significant adverse effects related to graded conditions and construction equipment, implementation ofMM-4.1-1 and MM-4.3-1 would reduce the scenic vista impacts associated with Project-related construction activities. Therefore, the presence of construction equipment on the Project site would be less than significant with mitigation. (DEIR, pp. 4.1-19 through 4.1-23.)

Mitigation Measures:

MM-4.1-1 Visual Shielding Plan. Prior to the issuance of a grading permit, the Applicant/Developer shall prepare a Visual Shielding Plan (Plan) to improve the overall aesthetic quality of construction areas. Plan requirements shall include the following:

1. Designated Staging Areas: The Plan shall require the establishment of one or more designated staging area(s) intended for the storage of construction equipment and vehicles, stockpiles, waste bins, and other construction-related materials during Project construction. The designated staging area(s) shall be located within the grading area on the northern portion of the Project site, strategically placed away from publicly-maintained trails and open-space areas to the south. Upon completion of construction activities for the day, all equipment shall be consolidated in the designated staging area(s) and any equipment or machinery not in use for a period of three of more months shall be removed from the Project site.
2. Visual Shielding: To address potential aesthetic impacts from construction equipment and activities, the Plan shall require establishment of visual shielding in the form of temporary, opaque fencing and/or cloth screening along the Project-site boundary fronting The Old Road as well as in the vicinity of the Taylor Trailhead and where the western leg of the Taylor Trail intersects with the Project site. Temporary, opaque fencing and/or cloth screening shall also be installed around the designated construction staging areas(s). The color palette of temporary fencing and/or cloth screening shall be restricted to neutral earth tones (e.g., shades of brown, green, gray, or beige).
3. Project Site Cleanliness/Management: All construction-related equipment and materials on the Project site shall be maintained in a clean and organized manner.
4. Monitoring**:** Monthly inspections shall be conducted to assess the effectiveness of the Plan. Any failed or poorly-performing visual shielding (e.g., damaged fencing and/or cloth screening) shall be replaced or repaired as soon as possible.

The Plan shall be reviewed and approved by the County to ensure compliance with this mitigation measure. Visual shielding and establishment of designated staging areas shall commence prior to grading or soil disturbance activities and shall be maintained throughout the construction period and until the site is permanently stabilized and/or developed.

MM-4.3-1 Construction Equipment. (See Air Quality header under Section 3.)

3.1.2 4.1d Public Views of the Site

Impact 4.1d Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or

other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage point)

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.1-29 through 4.1-37.)

Facts in Support of Finding: Construction. During construction, activities including the removal of miscellaneous structures, site preparation, including vegetation removal, grading, building construction, and paving would alter and transform the existing visual character of the on-site undeveloped hillside and valley terrain. In addition, construction activities would require the use of construction equipment and vehicles which would "activate" the Project site and introduce mobile construction vehicles and equipment not associated with existing conditions. Visual shielding (e.g., fencing) would not block views of construction activities, equipment, and materials from higher elevations; however, in accordance with MM-4.1-1, all construction-related equipment and materials on the Project site shall be stored in the designated staging area(s) when not in use and shall be maintained in a clean and organized manner. Other urban landscape features located adjacent to the north and east of the Project site require occasional construction/maintenance activities, which would also be visible from viewpoints at higher elevations. Therefore, construction would not substantially degrade views of the Project area when compared to existing conditions. With implementation of MM-4.1-1, construction related impacts to visual character and quality of public views of the Project site and its surroundings would be less than significant with mitigation.

A total of 334 of the SEA-Protected Trees would be impacted by the Project, including 312 non-heritage trees and 22 heritage trees. As the Project site's SEA Protected Trees currently provides aesthetic benefits such as shade and canopy coverage, removal of these trees could result in degradation of the site's existing visual quality. However, at a minimum, removal of any SEA Protected Tree would require mitigation in the form of two replacement plantings for non-heritage trees and ten replacement plantings for heritage trees, which would require 772 replacement trees to be planted. In accordance with MM-4.4-16, the required replacement trees would be planted where suitable growing conditions are present and would remain in perpetuity, to provide canopy coverage that mimics the valued visual elements of the existing SEA Protected Trees proposed for removal. Furthermore, the Project would be required to demonstrate compliance with the requirements of Chapter 22.102 of the Zoning Code through a Burden of Proof statement detailing how the Project would meet each SEA finding. Therefore, the Project would not conflict with elements of Chapter 22.102, SEAs pertaining to scenic quality, and impacts would be less than significant with mitigation.

Operation. Potential Conflicts with the General Plan and the OVOV. Applicable policies from the General Plan and OVOV are designed to enhance and protect scenic resources that contribute to the County's valued views. For example, in accordance with Policy CO 10.25, the Project would utilize clustering of development to retain approximately 150 acres of natural on-site open space in the southern portion of the Project site, as well as ribboned throughout the developed areas to the north. By concentrating growth near existing adjacent development and the I-5 corridor, open space would continue to provide a scenic landscape and backdrop to Project as viewed from public vantage points. The project would not conflict with goals, objectives, and/or polices governing scenic quality set forth in either the General Plan or the OVOV, and impacts would be less than significant within mitigation (MM-4.4-16) incorporated. (DEIR, p. 4.1-37.)

Mitigation Measures:

MM-4.1-1 Visual Shielding Plan.

MM-4.4-16 SEA Protected Trees Replacement / Compensation. (See Biological Resources header under Section 3.)

3.1.3 Cumulative Impacts – Aesthetics

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.1-40 through 4.1-45.)

Facts in Support of Finding: Due to elevation differences and the relative distance between the Project site and scenic vistas, regional riding, hiking, or multi-use trails, and officially-designated scenic highways, the Project would generally not result in cumulatively considerable aesthetic impacts with implementation of MM-4.4-1. Implementation of MM-4.3-1 and MM-4.17-2 would reduce nitrogen oxides (NO_x) and potential smog impacts adversely impacting the region. In addition, cumulative projects would be required to comply with existing laws regulating development in visually sensitive areas. For the Project and Cumulative Projects, this would include compliance with County Zoning Code provisions set forth in Chapters 22.104 (HMAs and Appendix I, Hillside Design Guidelines), 22.102 (SEAs), and 22.174 (Oak Tree Permit), which would further minimize any impacts to hillside areas and scenic biological resources (including oak trees), which could potentially degrade the quality of scenic viewsheds. Although Cumulative Project SC1 does not appear to include any HMAs, Cumulative Project SC1 would be required to comply with Santa Clarita Municipal Code Section 17.51.040 (Oak Tree Preservation), as well as the City's Community Character and Design Guidelines, and all applicable development standards pursuant to the Santa Clarita Municipal Code. (DEIR, pp. 4.1-40 through 4.1-45.)

Mitigation Measures:

MM-4.1-1 Visual Shielding Plan.

MM-4.3-1 Construction Equipment. (See Air Quality header under Section 3.)

MM-4.17-2 Transportation Demand Management (TDM) Program. (See Transportation header under Section 3.)

3.2 Agriculture/Forest

3.2.1 4.2d Loss of Forest Land

Impact 4.2d Would the project result in the loss of forest land or conversion of forest land to non-forest use?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.2-14 through 4.2-15.)

Facts in Support of Finding: The Project site supports scattered communities of native tree cover such as coast live oak, red willow, and California walnut throughout at least 10% of the site. Thus, as defined by PRC Section 12220(g), the Project site contains forest land. While development of the Project would result in the loss or conversion of forestland to non-forest use because the Project is located within the SEA, it would be subject to the provisions of the SEA Ordinance. Compliance with the SEA ordinance, including approval of the required SEA CUP, as well as applicable mitigation measures, including MM-4.4-16, SEA Protected Trees Replacement/Compensation, would

reduce forest land impacts to less than significant levels, and Project impacts would be less than significant with mitigation. (DEIR, pp. 4.2-14 through 4.2-15.)

Mitigation Measures:

MM-4.4-16 SEA Protected Trees Replacement / Compensation. (See Biological Resources header under Section 3.)

3.2.2 4.2e Conversion of Farmland or Forestland

Impact 4.2e Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Finding: Less Than Significant Impact with Mitigation (DEIR, p. 4.2-15.)

Facts in Support of Finding: The Project site does not contain, nor is it adjacent to, any land designated as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland. There are no existing agricultural uses on or adjacent to the Project site. The Project would not result in the conversion of Farmland to non-agricultural use, nor would it create land use conflicts with existing agricultural uses as no agricultural uses exist on or adjacent to the Project site. There would be no impact regarding Project changes in the existing environment, due to their location or nature, could result in conversion of Farmland to non-agricultural use. Regarding the Project's potential to involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use, native tree cover (which may be defined as forest land pursuant to PRC 12220[g]) on and adjacent to the Project site is within the SEA. The Project would conserve approximately 150 acres of this forest land within the SEA. However, for portions of forest land within the Project site that would be developed, the Project, as well as any future development proposed in areas adjacent to the Project site, would be subject to the provisions of the SEA Ordinance, which requires mitigation to address the removal of any SEA protected trees. Pursuant to the General Plan EIR, compliance with the County's SEA Ordinance would reduce potential impacts to forest land to less than significant levels. Thus, while the Project could involve changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use, compliance with the SEA ordinance, demonstrated through implementation of MM-4.4-1 and MM-4.4-16, would reduce these impacts to less than significant. (DEIR, p. 44.2-15.)

Mitigation Measures:

MM-4.4-1 On-Site Habitat Preservation. (See Biological Resources header under Section 3.)

MM-4.4-16 SEA Protected Trees Replacement / Compensation. (See Biological Resources header under Section 3.)

3.2.3 Cumulative Impacts – Agriculture and Forestry

Finding: Less Than Significant with Mitigation (DEIR, pp. 4.2-16 through 4.2-19.)

Facts in Support of Finding: Regarding cumulative impacts from the loss of forest land or conversion of forest land to non-forest use, cumulative forestry resources impacts would occur if other cumulative projects within the

unincorporated County, in combination with the Project would result in the loss of forest land or conversion of forest land. The General Plan EIR did not identify any substantial, adverse cumulative impacts to forestry resources in the County (County of Los Angeles 2014). While the Project site contains forest land, pursuant to the General Plan EIR, "…forest land within Los Angeles County is protected through the County's SEA Ordinance…" and "…compliance with the SEA Ordinance will reduce potential impacts to forest land to a less then significant level." In addition, MM-4.4-16 requiring replacement trees for removal of any SEA-protected tree and MM-4.4-2 regarding on-site establishment and restoration within the On-Site Conservation area if adequate off-site habitat cannot be preserved would be implemented to further reduce any potential impacts. Therefore, development of the Project would not result in a significant contribution to an existing cumulative impact, and cumulative impacts would be less than significant with mitigation.

Regarding cumulative impacts from other Project-related changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use, cumulative agriculture and/or forestry resources impacts could occur if other cumulative projects, in combination with the Project within the unincorporated County would result in conversion of Farmland to non-agricultural use or forest land to non-forest use. The General Plan EIR did not identify any substantial, adverse cumulative impacts to forestry resources. No Farmland is present on or adjacent to the Project site, or on or adjacent to the sites identified for Cumulative Projects LA1, LA2, LA3, and L13, nearest to the Project site which are within the unincorporated County, or within an incorporated City within the County (SC1). Similar to the Project, within the unincorporated County lands, several other cumulative projects are within an SEA, and are adjacent to undeveloped lands within the SEA that may support 10% or greater native tree cover, and thus may qualify as forest land pursuant to PRC Section 12220(g). However, forest lands in the County are protected under the SEA Ordinance, and any development within or adjacent to the Project site or sites for Cumulative Projects LA1 through LA14 would be subject to the provisions of the SEA Ordinance which, pursuant to the General Plan EIR, would reduce potential impacts to forest land to less than significant levels. Further, there is no existing cumulative impact to forestry resources in the County (as identified in the General Plan EIR). As such, development of the Project would not contribute to any cumulatively considerable agriculture or forestry resources impact and would not result in a significant contribution to an existing cumulative impact. (DEIR, pp. 4.2-16 through 4.2-19.)

Mitigation Measures:

MM-4.4-2 Habitat Mitigation and Monitoring Plan. (See Biological Resources header under Section 3.)

MM-4.4-16 SEA Protected Trees Replacement / Compensation. (See Biological Resources header under Section 3.)

3.3 Air Quality

3.3.1 4.3a Air Quality Plans

Impact 4.3a Would the project conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.3-34 through 4.3-36.)

Facts in Support of Finding: The Project site is within the jurisdiction of the SCAQMD, as detailed above. The applicable air quality plan for the Project site is the SCAQMD's 2022 air quality management plan (AQMP). The SCAQMD has established two criteria for determining consistency with the AQMP.

Regarding Consistency Criterion No.1, the Project would exceed the SCAQMD's mass daily regional significance threshold for NO_x during construction prior to mitigation. However, with implementation of MM-4.3-1, which requires the use of Tier 4 Final construction equipment for off-road equipment over 50 horsepower and electric or alternative fueled construction equipment less than 50 horsepower, the Project would not exceed any of the SCAQMD significance thresholds during construction or operation. Therefore, with MM-4.3-1, the Project would not result in an increase in the frequency or severity of existing air quality violations and the Project would not conflict with Consistency Criterion No. 1 of the SCAQMD CEQA Air Quality Handbook.

Regarding Consistency Criterion No. 2, while striving to achieve the National Ambient Air Quality Standards (NAAQS) for O_3 and $PM_{2.5}$ and the California Ambient Air Quality Standards (CAAQS) for ozone, course particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$) through a variety of air quality control measures, the 2022 AQMP also accommodates planned growth in the South Coast Air Basin (SCAB). Projects are considered consistent with and would not conflict with or obstruct implementation of the 2022 AQMP, if the growth in socioeconomic factors (e.g., population, employment) is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD CEQA Air Quality Handbook). The County's 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 Project's 10 employees would not exceed the County's annual projection for jobs. The Project would be consistent with the underlying assumptions within the AQMP and the Project's anticipated population and housing growth would not exceed SCAG's growth projections for the Santa Clarita Valley Planning Area, and the Project's designed population, housing, and employment would not exceed the annual growth projections for the County and the impact is less than significant. (DEIR, pp. 4.3-34 through 4.3-36.)

Mitigation Measures:

MM-4.3-1 Construction Equipment. Heavy-duty diesel-powered construction equipment greater than 50 horsepower shall be equipped with CARB-certified Tier 4 Final or better diesel engines. The County shall verify and approve all pieces within the construction fleet that would not meet Tier 4 Final standards. Equipment engines must be maintained in good condition and in proper tune as per manufacturer's specifications.

During construction activities, the contractor shall, at a minimum, electrify or use alternative fuels (non-diesel) for the operation of all equipment less than 50 horsepower (welders). In addition, electricity use during the construction activities shall come from the existing electric grid instead of a diesel generator. If a generator is necessary for the completion of construction activities, a non-diesel generator shall be used.

3.3.2 4.3b Cumulatively Considerable Net Increases of Criteria Pollutants

Impact 4.3b Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.3-36 through 4.3-46.)

Facts in Support of Finding: Construction. Construction activities associated with the Project and associated off-site improvements would generate criteria air pollutant emissions from the on- and off-site sources. Although construction-related volatile organic compound (VOC), carbon monoxide (CO), sulfur oxides (SO_x), PM_{10}, and $PM_{2.5}$ emissions would not exceed the SCAQMD thresholds during construction, the Project would exceed the SCAQMD mass daily thresholds for NO_x during construction. However, with implementation of MM-4.3-1, which requires the use of Tier 4 Final construction equipment for off-road equipment over 50 horsepower and electric or alternative fueled construction equipment less than 50 horsepower, construction impacts would be less than significant with mitigation incorporated.

Operation. Operation of the Project uses would be below the SCAQMD's mass daily regional thresholds, without mitigation. However, the Project would implement MM-4.8-1 through MM-4.8-3, MM-4.8-5, and MM-4.8-8 to reduce emissions of GHG, which would result in co-benefits to air quality emissions. The Project would result in an overlap of construction and operational emissions during the latter phase(s) of construction. Prior to mitigation, the Project would exceed the SCAQMD daily significance operational thresholds for VOC and NO_x during construction activities for the combined construction and operational scenario. However, after implementation of MM-4.3-1, MM-4.8-1 through MM-4.8-3, MM-4.8-5, MM-4.8-8, and MM-4.17-2, the combined construction and operations scenario would not exceed the SCAQMD daily significance operational thresholds. By its nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development (such as the cumulative emissions from various sources of air pollutants and their precursors within the SCAB, including motor vehicles, off-road equipment, and commercial and industrial facilities), and the SCAQMD develop and implement plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulative contribution on air quality. If a project's emissions would exceed the applied significance thresholds, it would have a cumulative contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. Since the Project would not exceed the SCAQMD significance thresholds during construction with mitigation and operation with no mitigation, the potential health effects associated with criteria air pollutants are considered less than significant. However, there are numerous scientific and technological complexities associated with correlating criteria air pollutant emissions from an individual project to specific health effects or potential additional nonattainment days, and there are currently no modeling tools that could provide reliable and meaningful additional information regarding health effects from criteria air pollutants generated by individual projects within the SCAQMD jurisdiction. For these reasons, conducting a health impact assessment may not yield accurate results and would likely overestimate health effects associated with the Project, especially considering that unlike the situation in *Friant Ranch*, there are no significant air quality impacts after mitigation. Therefore, the Project does not have the potential to violate an air quality standard or contribute substantially to an existing or projected air quality violation and the health effects associated with criteria air pollutants would be considered less than significant. As such, with implementation of mitigation measures, impacts regarding cumulatively considerable net increases of any criteria pollutant for which the project region is in non-attainment would be less than significant with mitigation incorporated. (DEIR, pp. 4.3-36 through 4.3-46.)

Mitigation Measures:

MM-4.3-1 Construction Equipment.

MM-4.8-1 Construction Emission Reductions. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.8-2 Electrify Buildings. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.8-3 Energy Conservation. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.8-5 Encourage Electric Vehicles. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.8-8 Landscape Maintenance Equipment Emission Reduction. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.17-2 Transportation Demand Management (TDM) Program. (See Transportation header under Section 3.)

3.3.3 4.3c Sensitive Receptors

Impact 4.3c Would the project expose sensitive receptors to substantial pollutant concentrations?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.3-46 through 4.3-50.)

Facts in Support of Finding: Construction. The closest off-site sensitive receptors to the Project site include residences located approximately 110 feet north of the Project site boundary. Construction activities associated with the Project would result in temporary sources of on-site fugitive dust and construction equipment emissions. Localized construction emissions would not exceed any concentration-based air pollutant thresholds. With implementation of MM-4.3-1, localized construction impacts, including associated health effects, would be less than significant.

The HRA prepared for the Project shows that the Residential Maximum Individual Cancer Risk would be below the significance threshold of 10 in 1 million for both on-site and off-site receptors after implementation of mitigation. Implementation of MM-4.3-1 would reduce emissions from construction to levels below SCAQMD thresholds. Thus, regarding exposure of sensitive receptors to substantial pollutant concentrations, site-specific impacts during construction would be less than significant with mitigation incorporated. (DEIR, pp. 4.3-46 through 4.3-50.)

Mitigation Measures:

MM-4.3-1 Construction Equipment.

3.3.4 Cumulative Impacts – Air Quality

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.3-52 through 4.3-53.)

Facts in Support of Finding: Implementation of the Project would result in construction and operational emissions that would be below the SCAQMD's mass daily regional significance thresholds with mitigation MM-4.3-1 for construction equipment, and as such, would not conflict with the SCAQMD's consistency criterion for consistency with an applicable AQMP. Therefore, the Project, in addition to the additional growth anticipated through cumulative projects would constitute a less than significant cumulative impact related to AQMP implementation with mitigation.

Air pollution by nature is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implement plans for future attainment of ambient air quality standards. The potential for the Project to result in a cumulatively considerable impact, specifically, a cumulatively considerable new increase of any criteria pollutant for which the Project region is nonattainment under an applicable NAAQS or CAAQS. Consistent with the finding for the Project, the cumulatively considerable net increase of any criteria pollutant for which the Project region is in nonattainment would be less than significant with MM-4.3-1 during construction and less than significant during operation for cumulative impacts.

The impact of the Project, in addition to growth, including other Cumulative Projects, could further increase the exposure of air quality pollutants to sensitive receptors. However, nearby Cumulative Projects would not result in substantial concentrations of TAC emissions during operation as they are predominantly residential and commercial projects with the majority of their emissions (mobile sources) off-site. Emissions during construction would disperse rapidly from the various sites and generally occur at magnitudes that would not affect substantial numbers of people. Consistent with the significance finding for the Project, during construction there would be a less than significant cumulative impact with mitigation related to exposure of sensitive receptors to substantial pollutant concentrations from TAC. Consistent with the significance finding for the Project, during operation there would be a less than significant cumulative impact related to exposure of sensitive receptors to substantial pollutant concentrations from TAC. (DEIR, pp. 4.3-52 through 4.3-53.)

Mitigation Measures:

MM-4.3-1 Construction Equipment.

3.4 Biological Resources

3.4.1 4.4a Candidate, Sensitive, or Special-Status Species

Impact 4.4a Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.4-40 through 4.4-50.)

Facts in Support of Finding:

Special-Status Plants

The Project would have a direct impact on six non-listed special-status plant species, including club-haired mariposa lily, Peirson's morning glory, Plummer's mariposa lily, scarlet keckiella, slender mariposa lily, and Southern California black walnut, which would be a potentially significant impact. The Project would result in 150.31 acres of unimpacted natural open space. As proposed, and as required by Section 22.102.090 (SEA Development Standards) of the County Code, the Project would preserve 144.43 acres of the total 150.31 acres within a conservation easement. MM-4.4-1, On-Site Habitat Preservation, ensures the preservation of this on-site 144.43-acre open space in perpetuity through recordation of a conservation easement (Conservation Area) where the remaining individuals were found during the surveys. MM-4.4-2, Habitat Mitigation and Monitoring Plan, would

improve the conditions of portions of the Conservation Area (see Figure 4.4-12, Proposed Habitat Enhancement/Restoration Areas on p. 4.4-121). MM-4.4-3, Special-Status Plants Seed and Bulb Survey, Salvage, and Translocation, would provide a program to collect, propagate, and disseminate these species into the Conservation Area. MM-4.4-4, Biological Monitoring, would provide monitoring to avoid any inadvertent impacts. MM-4.4-5, Demarcation of Disturbance Limits, would delineate the Project footprint to help avoid any inadvertent impacts to special-status plants. MM-4.4-6, Invasive Species Prevention, and MM-4.4-7, Landscaping Plan, would minimize the introduction of non-native plant species that could compete for habitat space with special-status species. As such, with the implementation of MM-4.4-1, MM-4.4-2, MM-4.4-3, MM-4.4-4, MM-4.4-5, MM-4.4-6, and MM-4.4-7, direct impacts to special-status species would be reduced to less than significant with mitigation.

Potential short-term or temporary indirect impacts to special-status plants would primarily result from construction activities and include impacts related to or resulting from the activities outside of the Project limits, generation of fugitive dust, increased human activity, and the introduction of pollutants from construction equipment. Excessive dust can decrease the vigor and productivity of plants through effects on light, penetration, photosynthesis, respiration, and transpiration; increased penetration of phytotoxic gaseous pollutants; and increased incidence of pests and diseases. Additionally, invasive plant species could be introduced by the Project during construction and through landscaping installation that could alter the habitat and compete with special-status plants. There is also a potential for the introduction of invasive, non-native plant species during the long-term landscaping of the completed Project. Long-term indirect impacts could also occur due to the increased human presence and associated edge effects that may occur as a result of Project build-out. These indirect impacts could result in additional loss of special-status plants that could be significant. Implementation of MM-4.4-5, MM-4.4-6, MM-4.4-7, and MM-4.4-13 would reduce potential impacts to less than significant with mitigation.

Special-Status Wildlife

Crotch's bumble bee. Harm to or the loss of Crotch's bumble individuals during construction could be significant due to reducing the numbers of a rare wildlife species and would require mitigation. MM-4.4-8, Crotch Bumble Bee Pre-construction Surveys, would require pre-construction surveys for Crotch's bumble bee nests, with buffers established around active nests until the nests are deemed inactive. Crotch's bumble bee is a generalist forager and could forage anywhere on site where suitable floral resources are present. The proposed Project would impact 18.31 acres of habitat with the potential to support foraging by Crotch's bumble bee in the form of coastal scrub, oak woodland, herbaceous, and grassland habitats. Impacts to 18.31 acres of habitat with the potential to support this species would be a significant impact prior to mitigation under CEQA. SEA guidelines recommend preservation of suitable habitat at a 5:1 mitigation ratio, for a total of 91.55 acres of recommended preservation of suitable habitat for this species. As required by MM-4.4-1, the Project would preserve 144.43 acres of native coastal scrub, chaparral, oak woodland, herbaceous, and grassland communities on site within the Conservation Area that would provide nesting and foraging opportunities for the species. Additional habitat preservation would be provided through implementation of MM-4.4-9, Off-Site Habitat Preservation, which would result in approximately 467 acres of off-site lands preserved in perpetuity in a conservation easement. The preservation of this off-site habitat is referred to as "Off-Site Conservation Area". Indirect impacts to Crotch's bumble bee could occur due to the use of herbicides and pesticides and competition with western honeybee (Apis mellifera) (The Xerces Society 2018). MM-4.4-1 would demonstrate recordation of a conservation easement for the On-Site Conservation area and requires a Conservation Management Plan (CMP) for the Conservation Area, and it shall include a condition that discourages herbicides and pesticides, and only CDFW-approved herbicides and pesticides may be used. The CMP required by MM-4.4-1 shall also have a condition that no commercial bee operations be allowed to use the Conservation Area for storing their apiaries. MM-4.4-1 and MM-4.4-9 would provide the preservation of areas that are expected to

provide forage and nest locations. MM-4.4-2 would improve the conditions of portions of the Conservation Area by providing additional foraging opportunities. MM-4.4-4 would provide monitoring to avoid any inadvertent impacts to potential foraging opportunities by ensuring inadvertent impacts outside of the Project footprint and mitigation measures are implemented. MM-4.4-5 would delineate the Project footprint to help avoid any inadvertent impacts to foraging opportunities by avoiding additional impacts to native vegetation. MM-4.4-6 and MM-4.4-7 would avoid and minimize the introduction of non-native plant species that could compete for habitat space with plants that the species forages on by ensuring that vehicles and equipment used during construction are weed free and prohibiting the use of invasive species in the landscaping. MM-4.4-8 would avoid direct impacts to nests by requiring pre-construction surveys and avoidance buffers. As such, with the implementation of MM-4.4-1, MM-4.4-2, MM-4.4-4, MM-4.4-5, MM-4.4-6, MM-4.4-7, MM-4.4-8, and MM-4.4-9, impacts to Crotch's bumble bee would be reduced to less than significant with mitigation.

Monarch Butterfly. Suitable overwintering habitat for the monarch butterfly does not occur within the Project footprint, and no distinctive stands of milkweed host plants were noted occurring within the Project footprint, so no direct take of monarch butterfly is expected to occur as a result of the Project. The Project would impact approximately 18.314.4 – acres of habitat with the potential to support foraging monarch butterfly during spring and summer months. Suitable spring and summer foraging habitat occur within the Project site in the form of arid scrub, oak woodland, herbaceous, and grassland habitats. Impacts to 18.31 acres of foraging habitat with the potential to support this species would be a significant impact prior to mitigation under CEQA, and the Project would not be compatible with SEA Resources. As proposed in MM-4.4-1, the Project would preserve 144.43 acres of native arid scrub, chaparral, oak woodland, herbaceous, and grassland communities on site within the Conservation Area. Given that the Conservation Area is contiguous with large tracts of conserved open natural space that exhibit similar levels of habitat suitability, the on-site conserved habitat possesses added value in that it represents a valuable habitat linkage for monarch butterfly. Additionally, the Conservation Area represents a significant topographical component of a viable wildlife corridor that can benefit long-term movement and genetic health of the species by allowing for foraging and dispersal opportunities between the Santa Susana Mountains/Simi Hills and the San Gabriel Mountains. SEA guidelines recommended preservation would be addressed making the Project compatible with SEA Resources and would reduce proposed impacts to below a level of significance under CEQA.

Direct and indirect impacts to individual monarch butterflies could occur due to the use of herbicides and pesticides and the establishment of non-native milkweed species (The Xerces Society 2014). MM-4.4-1 shall require a CMP for the Conservation Area, and it shall include a condition that discourages herbicides and pesticides, and only CDFW-approved herbicides and pesticides may be used.

With the implementation of MM-4.4-6 and MM-4.4-7, indirect impacts to non-native milkweeds would be avoided and minimized. MM-4.4-1 and MM-4.4-9 would demonstrate recordation of a conservation easement, to permanently preserve areas that are expected to provide foraging and breeding opportunities. MM-4.4-2 would improve the conditions of portions of the Conservation Area by providing additional foraging and breeding opportunities. MM-4.4-4 would provide monitoring to avoid any inadvertent impacts to potential foraging opportunities. MM-4.4-5 would delineate the Project footprint to help avoid any inadvertent impacts to foraging and breeding opportunities. MM-4.4-6 and MM-4.4-7 would minimize the introduction of non-native plant species that could compete for habitat space with plants that the species forages and breeds on. As such, with the implementation of MM-4.4-1, MM-4.4-2, MM-4.4-4, MM-4.4-5, MM-4.4-6, MM-4.4-7, and MM-4.4-9, impacts to the monarch butterfly would be reduced to less than significant with mitigation.

Reptiles. Direct impacts to California glossy snake, California legless lizard, Blainville's horned lizard, and coastal whiptail include being struck by moving vehicles or equipment if present on site during construction. These species are also vulnerable to mortality or injury during vegetation and ground-disturbing activities associated with construction because they tend to be cryptic, slow moving, and below ground or under rocks or debris during cooler periods. Indirect impacts to these species would be from the substantial loss of foraging and breeding habitat, as shown in Table 4.4-10 (DEIR, p. 4.4-44), and would be a potentially significant impact prior to mitigation. MM-4.4-1 and MM-4.4-9 would provide the preservation of areas (i.e., On-Site and Off-Site Conservation Areas) that are expected to provide foraging and breeding opportunities.

MM-4.4-10, Special-Status Wildlife Relocation Plan, would provide a methodology for pre-construction surveys, and relocation of individuals. MM-4.4-2 would improve the conditions of portions of the Conservation Area by providing additional foraging and breeding opportunities. MM-4.4-4 would provide monitoring to avoid any inadvertent impacts to potential foraging and breeding opportunities. MM-4.4-5 would delineate the Project footprint to help avoid any inadvertent impacts to foraging and breeding opportunities. MM-4.4-6 and MM-4.4-7 would minimize the introduction of non-native plant species that could compete for habitat space with plants that the species' prey forages on. As such, with the implementation of MM-4.4-1, MM-4.4-2, MM-4.4-4, MM-4.4-5, MM-4.4-6, MM-4.4-7, MM-4.4-9, and MM-4.4-10, impacts to special-status reptiles would be reduced to less than significant with mitigation.

Birds. The Project would remove nesting habitat that supports or has the potential to support several special-status bird species, which would not be compatible with SEA Resources. Additionally, common bird species protected under Migratory Bird Treaty Act and California Fish and Game Code could nest on the Project site and direct impacts could occur to bird species through the removal of active nests that result in mortality to eggs or nestlings. Indirect impacts would include construction activities that could cause adults to abandon active nests and the substantial loss of potential breeding and foraging habitat, which would not be compatible with SEA Resources. MM-4.4-1 and MM-4.4-9 would provide preservation that is expected to protect foraging and breeding opportunities. MM-4.4-11, Nesting Bird Avoidance, would require nesting bird surveys during the typical breeding season, and avoidance buffers and monitoring would be established to avoid impacts to nests, if present. MM-4.4-2 would improve the conditions of portions of the Conservation Area by providing additional foraging and breeding opportunities. MM-4.4-4 would provide monitoring to avoid any inadvertent impacts to potential foraging and breeding opportunities. MM-4.4-5 would delineate the Project footprint to help avoid any inadvertent impacts to foraging and breeding opportunities. MM-4.4-6 and MM-4.4-7 would minimize the introduction of non-native plant species that could compete for habitat space with plants that the species' prey forages on. As such, with the implementation of MM-4.4-1, MM-4.4-2, MM-4.4-4, MM-4.4-5, MM-4.4-6, MM-4.4-7, MM-4.4-9, and MM-4.4-11 impacts to special-status birds would be reduced to less than significant and provide the necessary preservation for the Project to be compatible with SEA Resources.

Non-Special-Status Nesting Birds. The Project has the potential to impact active nests of non-special-status bird species if vegetation is removed during the nesting season (February 1 to August 31). Direct impacts could occur to this species by the removal of active nests that result in mortality to eggs or nestlings. Indirect impacts would include construction activities that could cause adults to abandon active nests and that result in the loss of breeding and foraging habitat, and impacts would be significant prior to mitigation. Implementation of MM-4.4-11 would reduce impacts to less than significant with mitigation.

Mammals. The Project would remove habitat that supports or has the potential to support special-status mammals, including the American badger, San Diego black-tailed jackrabbit, San Diego desert wood rat, and Southern California mountain lion. Direct impacts could also occur to occupied burrows and middens. Indirect

impacts to these species would be from the loss of foraging and breeding habitat. Indirect impacts to mammals, including bats, could occur from new lighting established by the completed Project and its operations. Implementation of MM-4.4-12, Lighting Plan, would reduce indirect impacts from lighting during Project operation to less than significant.

MM-4.4-1 and MM-4.4-9 require recordation of a conservation easement for the required open space in the Conservation Areas, which is expected to provide foraging and breeding opportunities for the species. MM-4.4-2 would improve the conditions of portions of the Conservation Area by preserving remaining foraging and breeding opportunities. MM-4.4-4 would provide monitoring to avoid any inadvertent impacts to potential foraging opportunities. MM-4.4-5 would delineate the Project footprint to help avoid any inadvertent impacts to foraging and breeding opportunities. MM-4.4-6 would minimize the introduction of non-native plant species that could compete for habitat space with vegetation that the species or their prey rely on. MM-4.4-10 would provide guidance on the relocation of the species (outside the breeding season). As such, implementation of MM-4.4-1, MM-4.4-2, MM-4.4-4, MM-4.4-5, MM-4.4-6, MM-4.4-9, MM-4.4-10, and MM-4.4-12 would reduce impacts to these special-status mammals to less than significant and provide the necessary preservation for the Project to be compatible with SEA Resources.

California Mountain Lion. Because California mountain lion is protected species, Project impacts resulting in direct take of California mountain lion would require an Incidental Take Permit under California Endangered Species Act (CESA) through coordination with CDFW; however, no natal dens have been detected during field efforts that have resulted in extensive cover of the Project site, and none are expected. Therefore, no direct take of California mountain lion is expected to occur with implementation of the proposed Project.

Mountain lion movement from northwest and west to the south is expected to remain functional despite some constriction along its northern edge by the Project since there are geographic features (ridges and canyons), with hiking trails, within the Conservation Area that have connectivity to Rivendale Open Space, which is adjacent to the open space in Towsley Canyon. These two open space areas are the closest to the Calgrove Boulevard underpass, which could facilitate movement beneath I-5 and into Wildwood Canyon Open Space and Gates King Open Space. Additionally, the Resource Conservation District of the Santa Monica Mountains (RCDSMM) is working on a feasibility study for the Newhall Pass I-5 Wildlife Crossing, which is expected to provide connectivity between the Santa Susana Mountains and the San Gabriel Mountains.

As proposed, and as required by Section 22.102.090 (SEA Development Standards) of the County Code, the Project would preserve 144.43 acres of suitable habitat for this species on site within the Conservation Area (MM-4.4-1, as preserved in perpetuity through recordation of a conservation easement), and additional habitat is expected to be preserved off site, within the Off-Site Conservation Area (MM-4.4-9). Given that the proposed Conservation Area consists of areas identified as medium to high in terms of suitability for live-in, foraging, cover, and movement of mountain lions, and that it is also contiguous with large tracts of conserved open natural space that exhibit similar levels of habitat suitability and function, the proposed Conserved Area possesses added value in that it represents a valuable habitat linkage for mountain lion. Additionally, the Conservation Area represents a significant topographical component of a viable wildlife corridor that can benefit mountain lion movement and the genetic health of local mountain lion populations in the long-term by facilitating movement between the Santa Susana Mountains/Simi Hills and the San Gabriel Mountains, by way of the Calgrove Boulevard undercrossing, one of very few recognized crossing points of I-5.

MM-4.4-2 would improve the conditions of portions of the Conservation Area by providing additional foraging opportunities for the species' prey. MM-4.4-4 would provide monitoring to avoid any inadvertent impacts to potential foraging opportunities for the species' prey. MM-4.4-5 would delineate the Project footprint to help avoid any inadvertent impacts to foraging opportunities for the species' prey. MM-4.4-6 and MM-4.4-7 would minimize the introduction of non-native plant species that could compete for habitat space with vegetation that the species or their prey rely on. As such, implementation of MM-4.4-1, MM-4.4-2, MM-4.4-4, MM-4.4-5, MM-4.4-6, and MM-4.4-7 would reduce impacts to mountain lion to less than significant and provide the necessary preservation for the Project to be compatible with SEA Resources.

Following the completion of the Project, indirect and inadvertent impacts to mountain lion could occur due to human occupancy of the Project site and people using the recreational trails in the Conservation Area. These impacts include traffic collisions, human–mountain lion interactions due to the attraction of prey, the use of rodenticides, lighting; and through increased use by recreationalists. MM-4.4-13, Homeowners' Association Covenants, Conditions, and Restrictions, requires that the community be informed through signage about the potential presence of mountain lions in the community. As such, with the implementation of MM-4.4-13, indirect impacts to mountain lion from human influence would be reduced to less than significant with mitigation.

Foraging Habitat for Special-Status Wildlife Species. The Project, as proposed, would impact substantial suitable foraging habitat for grasshopper sparrow, Wilson's warbler, lesser nighthawk, white-tailed kite, pallid bat, western mastiff bat, and several special-status species that have potential to forage within the site, including California condor, golden eagle, Swainson's hawk, California leaf-nosed bat, and Townsend's big-eared bat.

MM-4.4-1 and MM-4.4-9 shall demonstrate recordation of a conservation easement of the On-Site and Off-Site Conservation Area that is expected to provide forage opportunities, for the required open space in the Conservation Areas. MM-4.4-2 would improve the conditions of portions of the Conservation Area by providing additional foraging opportunities. MM-4.4-4 would provide monitoring to avoid any inadvertent impacts to potential foraging opportunities. MM-4.4-5 would delineate the Project footprint to help avoid any inadvertent impacts to foraging opportunities. MM-4.4-6 and MM-4.4-7 would minimize the introduction of non-native plant species that could compete for habitat space with plants that the species and the species' prey forage on. As such, implementation of MM-4.4-1, MM-4.4-2, MM-4.4-4, MM-4.4-5, MM-4.4-6, MM-4.4-7, and MM-4.4-9 would reduce direct impacts to foraging habitat to special-status wildlife species to less than significant and provide the necessary preservation for the Project to be compatible with SEA Resources.

Potential short-term or temporary indirect impacts to special-status wildlife would primarily result from construction activities and include impacts related to or resulting from the activities outside of the Project limits, generation of fugitive dust, increased human activity, and the introduction of pollutants from construction equipment. MM-4.4-4, MM-4.4-5, MM-4.4-6, and MM-4.4-7 would reduce potential indirect impacts to below a level of significance by providing a clear demarcation of Project limits, monitoring, and avoiding and minimizing the use of invasive plants. Therefore, with the implementation of MM-4.4-4, MM-4.4-5, MM-4.4-6, and MM-4.4-7 impacts on species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, by CDFW or USFWS would be less than significant. (DEIR, pp. 4.4-40 through 4.4-50.)

Mitigation Measures:

MM-4.4-1 On-Site Habitat Preservation. Prior to final map recordation, the on-site conservation easement area shall be designated on the final map. Additionally, a letter of intent shall be obtained from the Conservation Easement holder. Prior to the issuance of a grading permit, the Applicant shall

demonstrate recordation of a conservation easement, as defined by California Civil Code Section 815.1, that permanently preserves 144.43 acres of open space within the Project boundaries for long-term conservation and management as a natural conservation area ("Conservation Area"). The following table documents the vegetation communities that would be preserved. The Conservation Area provides sufficient preservation for Project-related impacts to vegetation communities within Resource Categories 4 and 5 of the Significant Ecological Area Ordinance Implementation Guide.

Alliance	Unimpacted Acres (Open Space)	Preserved via Conservation Easement
SEA Resource Category 1		
Baccharis salicifolia Shrubland	0.52	0.52
Salix gooddingii–Salix laevigata Forest and Woodland	0	0.0
Sub-Total	*0.52*	*0.52*
SEA Resource Category 3		
Ericameria palmeri Provisional Shrubland	0	0
Eriodictyon crassifolium Provisional Shrubland	0.41	0.41
Juglans californica Forest and Woodland	0.09	0.09
Nassella (*Stipa*) spp.–*Melica* spp. Herbaceous	0	0
Quercus agrifolia Forest and Woodland	10.64	10.28
Rhus trilobata–Crataegus rivularis–Forestiera pubescens Shrubland	0.01	0.01
Sub-Total	*11.15*	*10.79*
SEA Resource Category 4		
Adenostoma fasciculatum Shrubland	69.77	64.68
Adenostoma fasciculatum Shrubland–Disturbed	9.73	9.73
Artemisia californica–Salvia leucophylla Shrubland	28.01	28.01
Artemisia californica–Salvia leucophylla Shrubland–Disturbed	10.66	10.66
Avena spp.–*Bromus* spp. Herbaceous Semi-natural	2.62	2.62
Distichlis spicata Herbaceous	0.07	0.07
Eriogonum davidsonii/Croton setiger Grassland	0	0
Eriogonum fasciculatum Shrubland	0	0
Sub-Total	*120.87*	*115.77*
SEA Resource Category 5		
Brassica nigra–Centaurea melitensis Herbaceous Semi-natural Stands	16.47	16.24[a]
Non-SEA Resource Category		
Developed[1]	1.31	1.11
Total Acres	**150.31**	**144.43**

Notes: SEA = Significant Ecological Area.

[a] 16.24 acres of this community are proposed to be restored per MM-4.4-2.

[1] Existing trails.

Conservation Management Plan. As part of recording the conservation easement, a Conservation Management Plan (CMP) applicable to the On-Site Conservation Area shall be prepared and submitted to the County of Los Angeles for approval. The CMP shall identify the required resource management activities and the entities that shall be responsible for managing those activities in perpetuity. The CMP shall set forth the following requirements that shall be implemented by the entity that holds the conservation easement and/or manages and stewards the Conservation Area: (1) there shall be no grading or other construction activities within the On-Site Conservation Area, except for the proposed habitat enhancement/restoration, construction and maintenance of signage, and trail maintenance; (2) off-trail activities (e.g., hiking, biking, horseback riding) shall be prohibited; (3) signage shall be installed at the trailheads and at any access points to the On-Site Conservation Area, which shall include information on the organization that holds the conservation easement, brief descriptions of the restoration activities, protection of biological resources, and restrictions to human activities; (4) signage shall be placed in visible locations that prohibits smoking and that requires that humans and domesticated pets remain within the limits of designated hiking trails, all domesticated pets be on leashes, and owners clean up after domesticated pets; (5) no fencing that represents a barrier to wildlife movement or other barriers to wildlife movement shall be installed; (6) dog waste bag dispensers and wildlife-proof receptacles for trash shall be provided at appropriate locations on the trail; (7) gasoline-powered maintenance equipment shall be prohibited; (8) commercial honeybee operations shall not be allowed to use the On-Site Conservation Area for storing their apiaries; (9) rodenticides shall be prohibited; (10) herbicides and pesticides shall be discouraged, and only those typically used for invasive plant management in California wildlands shall be allowed, per the California Invasive Plant Council and Pesticide Research Institute's 2015 Best Management Practices (BMPs) for Wildland Stewardship: Protecting Wildlife When Using Herbicides for Invasive Plant Management; (11) arborists certified by the International Society of Arboriculture (ISA) shall conduct surveys every five years that shall include an assessment of potential infestations of invasive shothole borer beetle and other pathogens or invasive insects that can threaten native habitat; (12) at least one annual walk-through survey shall be conducted by a biologist to qualitatively monitor the general condition of on-site habitats and to check for any new introduction or expansion of invasive plant species; (13) collect and remove trash, repair vandalized signs, and rectify trespass impacts; and (14) provide annual reporting that document the conditions of the Conservation Area.

Approved work shall be outlined in the CMP and in the conservation easement, including monitoring and maintenance efforts or for other activities associated with preserve management, and prohibited activities shall be delineated. The conservation easement holder shall be an entity that has as part of its mission the protection of the environment, including lands, plant species, and/or wildlife species, and can be expected by its organization and history to remain in existence for the foreseeable future. The California Department of Fish and Wildlife per Government Code Section 65967(c) shall review the entity. The entity that holds the endowment shall first meet the criteria outlined in Government Code Section 65968(b). Funding for the conservation easement and implementation of the tasks in the CMP shall be maintained in perpetuity and shall be provided by a traditional endowment, establishing a community facilities district or landscape management district, or through contractual obligation with the Homeowners' Association (HOA) or other equivalent mechanism(s).

MM-4.4-2 Habitat Mitigation and Monitoring Plan. After implementation of MM-4.4-9, if the Los Angeles County Department of Regional Planning (Planning) determines that sufficient habitat is not preserved off site, per MM-4.4-9, then on-site establishment and restoration shall be conducted in the On-Site Conservation Area (MM-4.4-1). Prior to the issuance of a grading permit, a qualified biologist shall be retained to prepare a Habitat Mitigation and Monitoring Plan (HMMP) detailing the specific approach for each type of habitat restoration and establishment area, special-status species transplant location, and Significant Ecological Area protected tree transplant/planting and outlining detailed performance standards and monitoring requirements for each, following the monitoring and reporting methods and performance standards listed below. Planning approval of the HMMP shall be required prior to the onset of Project-related ground-disturbing activities. When specified for each habitat type below, the acreages allotted for on-site establishment apply to a total of 16.24 acres of *Brassica nigra–Centaurea melitensis* herbaceous semi-natural stands.

- On-site establishment of 0.84-acre of *Eriodictyon crassifolium* provisional shrubland alliance
- On-site restoration/establishment of 0.07-acre of *Rhus trilobata–Crataegus rivularis–Forestiera pubescens* shrubland alliance
- On-site establishment of 15.20 acres *Quercus agrifolia* forest and woodland alliance

Habitat Restoration/Enhancement Implementation

The following best management practices shall be implemented during the implementation of the habitat restoration/enhancement activities.

Schedule: Establishment of restoration/revegetation sites shall be conducted during the appropriate time of year (between October 15 and January 30), with planting and/or seeding occurring immediately after the restoration sites are prepared.

Stressors: Any stressors causing habitat degradation should be addressed prior to starting restoration. This includes the removal of invasive plants and trash. Removal of invasive species shall include the following:

- Removal of non-native species in patches of native habitat shall be conducted in such a way as to minimize impacts to the existing native vegetation.
- Any proposals for use of herbicide treatments should be accompanied by a plan that demonstrates the following:
  - That other methods of invasive species control have been tested and that a single application of herbicide has been determined to be the best solution
  - That there is a post application plan for revegetation and/or mulching;
  - That the treatment is a one-time application.
- Pre-emergent herbicide shall not be used.

Plant Material. The following shall be implemented:

- Details regarding the planned source of their plant material shall be provided.

- All stock from nurseries shall be derived from plants originally collected within cismontane County.
- Plant material used for habitat restoration purposes shall consist of native species that are local to the immediate area of the mitigation site.
- All plant material proposed for use in a habitat restoration program shall be inspected by a County-approved Restoration Biologist to ensure that all container plants are in good health and do not contain pests or pathogens that may be harmful to existing native plants or wildlife species.
- Container plants and other landscaping materials (including organic mulches) should be inspected by the County Planning-approved Restoration Biologist to ensure they do not contain Argentine ant (*Linepithema humile*).
- Native seed mixes shall be inspected by the County-approved Restoration Biologist prior to their application to ensure that they contain the proper species and that seed packages are in good condition and do not contain any pests or pathogens.
- Diseased or infested plant, seed, or landscape materials should be removed from the site and transported to an appropriate off-site green waste facility.
- One application of mulch shall be done, except for areas that shall provide nesting opportunities for native bees.

Maintenance Plan/Guidelines. A Maintenance Plan shall be included that outlines the following: (1) weed control, including cleaning of equipment to prevent further spread or introduction of new weeds; (2) herbivory control; (3) trash removal; (4) irrigation system maintenance; (5) maintenance training; and (6) replacement planting.

Signage and Fencing. Signage specifications shall be developed to indicate the site is a restoration/preserve area and to either indicate that trespassing is not allowed or to instruct visitors to stay on trails. Specifications on fencing to protect biological resources and restrict human access shall be provided.

Monitoring Methods

Proposed plantings, enhancement/restoration, and receptor sites shall be monitored for 10 years following the completion of seeding or planting. The monitoring program shall consist of the observation and evidence of vegetative growth and the observation of emergent and flowering special-status plant species where required, along with seed production for flowering plants, photo-documentation, and measurements of annual rainfall.

A County Planning-approved Restoration Biologist, restoration specialists, biologists, or horticulturists with appropriate credentials and experience in native habitat restoration shall perform monitoring. Continuity within the personnel and methodology of monitoring shall be maintained insofar as possible to ensure comparable assessments.

The Biologist shall conduct monitoring surveys quarterly during the non-growing season for each enhanced or restored habitat type or particular plant species where required. During the growing period, or as soon as vegetative growth is observed, the enhancement/restoration and receptor

sites shall be monitored on a every other week basis through seed production for 10 years to document the growth of the enhanced or restored habitat type or replacement population.

Qualitative surveys, consisting of a general site walkover and habitat characterization, shall be completed during each monitoring visit. General observations, such as growth, flowering, and seed production, as well as pest problems, weed establishment, mortality, and site security, shall be noted in each site walkover. The Project Biologist shall also note observations on native plant recruitment for the purpose of later discussion in the annual reports. Records shall be kept of mortality and other problems, such as insect damage, weed infestation, and soil loss.

Surveying Flowering and Seed Production. In the case of replacement populations for specific species, flowering individuals observed within receptor sites shall be counted. As noted above, quantitative surveys may require multiple visits per month as the blooming period may be staggered along several months (i.e., vegetative growth or non-blooming individuals may not be detected until that individual has bloomed). Peak blooming periods may fluctuate year to year due to seasonal conditions; therefore, multiple visits shall aid in a more accurate count of flowering individuals. Each flowering individual in the restoration plots shall be tallied and recorded on data sheets. The total yearly population shall be calculated each year for the annual monitoring results.

Photo-Documentation. Permanent stations for photo-documentation shall be established prior to or during the first annual monitoring event. Photos shall be taken each monitoring period from the same vantage point and in the same direction each year and shall reflect material discussed in the annual monitoring report.

Monitoring Schedule. During the growing period, or as soon as vegetative growth is observed, each enhancement/restoration and receptor site shall be monitored monthly through seed production for 10 years.

Annual Monitoring Reports. At the end of each monitoring period, an annual report shall be prepared for submittal to County Planning. The report shall summarize the information collected during the qualitative and quantitative monitoring. Each report shall document the monitoring methods and description of the enhancement/restoration and receptor sites and provide copies of field data, photo-documentation, monitoring results, an analysis of success, and recommendations for the project and/or remedial measures if necessary.

Since seeding of particular species may not occur when planned, monitoring shall be tied to the actual implementation date (e.g., the first annual report shall be delivered on January 1st of the year following the first growing season after enhancement/restoration and/or seeding). These reports shall describe the success of the relocation and shall discuss the efficacy of the various methods employed to propagate this species. These reports shall also include the following:

- A list of names, titles, and companies of all persons who prepared the content of the annual report and participated in monitoring activities for that year
- A vicinity map indicating location of the mitigation site
- A mitigation site plan, identifying plot locations, photo station locations, etc. as appropriate

- Copies of all monitoring photographs
- An analysis of all qualitative and quantitative monitoring data

Performance Standards

The performance standards set forth below are to be achieved for the mitigation and monitoring program to be considered successful. Because of the variability of growing conditions and the number of flowering individuals from year-to-year, the performance standards shall be considered to have been achieved if during any of 3 years of the 10-year monitoring period, the target acreage or population number is achieved. Thus, the annual standards provide a guide showing that the program is on a positive trajectory.

- The growing conditions and number of flowering individuals in any given year can vary substantially, based on environmental conditions, such that it is necessary to observe translocated populations over a period of years to accurately determine survival. To this end, this plan includes a 10-year monitoring term to track flowering individuals, which provides the best and easiest indicators to track that the translocation is succeeding.
- Various threats to plants must be minimized to ensure survival and ultimate flowering of seeded individuals leading to future germination/successful reproduction.
- Habitat characteristics including non-native grasses and herbaceous weeds are important and require monitoring to determine that specific enhancement/restoration areas and translocation/receptor sites are exhibiting a positive trajectory.

Should the performance standards be achieved early in the program, monitoring shall continue for the full 10 years to ensure that there is no degradation of the habitat values during the 10-year period.

Performance Standards for 10-Year Monitoring Period

- Flowering of the total number of flowering plants originating from seed shall equal or exceed the number of container individuals counted during the 2-year monitoring period (at least 3 years of the 10-year monitoring period).
- Emergence of leaves for of a minimum of 80% of the translocated bulbs
- Flowering of a minimum of 60% of the translocated bulbs
- Survival of 80% of established individuals
- Habitat subject to translocation must exhibit same or less cover by non-native grasses and forbs than during the initial planting (30%).

Adaptive Management

The HMMP shall include adaptive management strategies in the event the mitigation and monitoring program fails to achieve the performance standards discussed above during the 10-

year monitoring period; the Project Applicant shall implement the following remedial measures to attempt to achieve the performance standards:

- If the enhancement/restoration areas or receptor sites are observed to be failing significantly to achieve the performance standard during the 10-year monitoring period, the Biological Monitor shall identify an alternate site(s) in the Conservation Area in which to broadcast seed from a contingency seed supply held at a seed facility (and maintained for at least 10 years). Should the performance standards be achieved, contingency seed would be broadcast in the enhancement/restoration areas or receptor sites.
- If receptor sites appear on track to meet the performance standards, any remaining plant material may be planted after 5 years at the receptor sites (if space allows) or additional acceptable receptor sites shall be identified. This would allow for 5 years of monitoring of the container stock.
- Seeds and/or bulbs shall continue to be harvested from plants maintained in the nursery and installed in the receptor sites on an as-needed basis to ensure translocation/receptor sites are progressing toward final performance.
- The alternate site shall be prepared as outlined for the initial site and modifications incorporated as determined by the Project Biologist in coordination with County Planning. Once an approach has been determined in coordination with the County, the seed would be broadcast at the contingency seed and seeded at the alternate site, and a 10-year program, that includes monitoring and maintenance, would be initiated as set forth above.

MM-4.4-3 Special-Status Plants Seed and Bulb Survey, Salvage, and Translocation. The required Conservation Management Plan (CMP) approved by the County of Los Angeles (County) shall include a Special-Status Plant Mitigation and Monitoring Plan (SSPMMP) that shall provide guidance and methods to preserve the special-status plants known to occur within the Conservation Area (slender mariposa lily [*Calochortus clavatus* var. *clavatus*], Plummer's mariposa lily [*Calochortus plummerae*], Peirson's morning glory [*Calystegia peirsonii*], and scarlet Keckiella [*Keckiella ternata*]), along with a program of special-status plants seed collection and dispersal within the Conservation Area. The SSPMMP shall also include methods and approach to translocating mariposa lily individuals proposed for impact into the Conservation Area. The SSPMMP shall be developed and implemented with a program that does not conflict with other conservation easement resource management objectives.

The SSPMMP shall provide details on site preparation measures, as well as specific methods for the pre-construction collection of seeds from all four species and the harvest of mariposa lily bulbs from impacted populations. The SSPMMP shall also provide detailed methods for the dispersal of that seed and the translocation of the harvested bulbs into the conservation easement areas within locations with appropriate soils and growing conditions for each species, as determined by a qualified biologist in coordination with the County and California Department of Fish and Wildlife. Finally, the SSPMMP shall provide a schedule and action plan for the maintenance and monitoring programs, including success criteria, and remedial contingency measures to be implemented if efforts are not successful.

Pre-construction surveys shall be conducted in the Project footprint to map slender mariposa lily, Plummer's mariposa lily, Peirson's morning glory, and scarlet keckiella individual locations with a

high-accuracy GPS unit and a permanent marker established in the field to locate the individual mariposa lilies for bulb collection. Seeds shall be collected from each species at the appropriate time of year. Mariposa lily bulbs shall remain in the ground until Project development. Prior to Project development, the bulbs shall be translocated within appropriate habitat in the Conservation Area.

Performance Standard. Monitoring shall take place annually for 5 years from the time of establishment of the mariposa lily bulbs. The following success criteria is the minimum required by the end of the 5-year monitoring period:

- 25 slender mariposa lily
- 44 scarlet keckiella
- 600 Peirson's morning glory
- 128 Plummer's mariposa lily

If it appears that the population of these special-status plant species (slender mariposa lily, scarlet keckiella, Peirson's morning glory, and Plummer's mariposa lily) or the vegetation community composition and status are on the decline or have been degraded, remedial activities shall be implemented according to the CMP and the SSPMMP, and monitoring shall continue until the success criteria are met. These activities may include weed control, additional seeding, native plant establishment, or other activities where appropriate.

Annual monitoring reports shall be submitted by August 31 of each year and shall include an evaluation of current monitoring data in relation to previous population observations (during previous monitoring years) and native enhancement efforts for slender mariposa lily, scarlet keckiella, club-haired mariposa lily, Peirson's morning glory, and Plummer's mariposa lily. These reports shall also include any recommendations for remedial management measures and shall discuss other issues that need to be addressed, such as trespassing or vandalism.

MM-4.4-4 Biological Monitoring. Prior to the issuance of a grading permit, the Applicant shall submit the qualifications of potential Biological Monitor(s) to the County of Los Angeles (County) Department of Regional Planning (Planning) for review and approval. The Applicant shall then fund the County Planning-approved Biological Monitor(s) during Project construction to monitor construction activities and to ensure compliance with all mitigation measures. The Biological Monitor shall be present on site during all vegetation removal and each day prior to the commencement of grading activities. The Biological Monitor shall be responsible for conducting a pre-construction clearance survey, and any wildlife (common or special-status) shall be relocated to the Conservation Area. Pre-construction clearance surveys shall be conducted prior to construction of each new phase of the development. The Biological Monitor shall ensure that wildlife do not become entrapped in excavation or trenching areas. Safeguards shall be implemented during daytime periods of non-activity and overnight, such as a placing a platform over trenches, flush with the ground surface; installing escape ramps in trenches; or installing exclusionary fencing. Should relocation of any trapped wildlife be required, construction shall be halted until the Biological Monitor arrives on site and clears the work area (in compliance with all applicable permits and authorizations).

Burrowing owl has the potential to occur as a transient during dispersal and migration. Focused pre-construction surveys for burrowing owl shall be conducted weekly by the Biological Monitor beginning 30 days prior to the commencement of vegetation removal, with the last/fourth survey being conducted three days prior to the commencement of vegetation removal. If burrowing owl are located during any focused pre-construction surveys, or during the monitoring of construction activities, a 500-foot no-work buffer shall be established around the location of the burrow(s), and County Planning and California Department of Fish and Wildlife (CDFW) shall be notified. CDFW shall be consulted regarding the potential need for an Incidental Take Permit per California Fish and Game Code 2081. The no-work buffer shall remain in place until the until the Project Applicant obtains confirmation from CDFW that it can be removed. The results of the surveys and any associated monitoring shall be documented in a Burrowing Owl Survey/Monitoring Report that shall be submitted to County Planning. The Biological Monitor shall also monitor any colonial roosts located within 500 feet from the Project limits to determine if Project activities are having a detrimental effect on the roost. If bats are exhibiting distress due to noise generated by Project activities, the Biological Monitor shall work with the construction contractor on ways to reduce activities in the proximity of the roost (e.g., limiting the number of tractors in the area). The results of the protective actions will be documented in the daily monitoring report.

The Biological Monitor shall regularly inspect the Project site as needed after the completion of all grading activities. Monthly spot-check monitoring is anticipated to be required throughout the construction of the Project for those areas that are graded but not yet developed/landscaped. During monthly visits, the biological monitor shall do the following: (1) address the potential establishment of invasive species and require weed abatement (if necessary) in accordance with MM-4.4-6, Invasive Species Prevention; (2) address the potential establishment of native vegetation/habitat to reduce the potential for impacts between phases of construction; (3) identify deficiencies, if applicable, with any erosion control measures that have the potential to negatively impact biological resources.

Daily monitoring reports shall be prepared by the Biological Monitor that at a minimum document the results of any surveys conducted, wildlife relocations, construction activities performed, compliance issues observed, and corrective actions taken. The monitoring reports shall include photos. The monitoring reports shall be made available to County Planning and the California Department of Fish and Wildlife at their request.

MM-4.4-5 Demarcation of Disturbance Limits. Prior to commencement of earthwork for each phase of Project construction, the construction limits shall be clearly demarcated (e.g., installation of flagging or temporary high visibility construction fence), as recommended by the Biological Monitor approved by the County of Los Angeles. All construction activities, including equipment staging and maintenance, shall be conducted within the marked disturbance limits to prevent inadvertent disturbance to sensitive vegetation communities outside the limits of work. The flagging shall be maintained throughout construction.

MM-4.4-6 Invasive Species Prevention. The Project shall not include invasive plant species listed on Appendix C of the SEA Ordinance Implementation Guide and in the California Invasive Plant Council inventory in Project landscaping palettes. Project landscape palettes shall be reviewed and approved by the County of Los Angeles (County) to ensure that invasive plant species are excluded.

In addition, to prevent the spread of invasive plant species during construction and until the establishment of common landscaped areas associated with the Project, the following measures shall be implemented:

- A Workers Environmental Awareness Training (WEAT) program shall be prepared that shall include invasive species prevention measures implemented by the Project. The WEAT shall include descriptions of the common invasive plants known in the region. The WEAT shall also include descriptions of sensitive resources known to occur on the Project site and the procedures to follow should a sensitive resource be encountered.
- All mobile vehicles and construction equipment shall be washed prior to entering the Project site in an upland location where any seed material from invasive species shall be contained and not carried onto the Project site. Logs of the washing shall be submitted monthly to the County Department of Regional Planning.
- Following the completion of grading activities, for those areas of the Project site that are graded but not yet developed/landscaped, the County-approved Biological Monitor shall conduct monthly spot checks to prevent the introduction or establishment of invasive plant species onto the graded areas (see MM-4.4-4, Biological Monitoring). If invasive species are identified, the Biological Monitor shall remove the plants with hand tools or weeding equipment to prevent propagation.
- All vegetative material removed from the Project footprint shall be transported in a covered vehicle and shall be disposed of at a certified disposal site.

MM-4.4-7 Landscaping Plan. Prior to the issuance of the first grading permit, the Applicant shall prepare a Landscaping Plan for the areas maintained by the Homeowners' Association (HOA) and submit the Landscaping Plan to the County of Los Angeles for review and approval. The Landscaping Plan for the HOA-maintained areas shall include, but not be limited to, the following requirements:

- The plant species list shall include scientific names, common names, plant container sizes, and quantities.
- Invasive plant species (designated by California Invasive Plant Council) shall not be included in the Landscaping Plan as they could establish off site and have negative impacts to the adjacent habitats.
- Non-native milkweeds shall not be included in the landscaping plan as they could establish off site and have negative impacts to the adjacent habitats.
- The plant layout shall indicate the location of the plant species.
- Planting notes shall include irrigation and plant installation requirements such as mulch requirements.
- Ornamental varietals and selections of native species shall be avoided if they have the potential to hybridize with local native populations.
- Where native species are required, the species shall be indigenous native species of the region (locally indigenous native species).

MM-4.4-8 Crotch's Bumble Bee Habitat Preservation and Minimization Measures.

Incidental Take Permit**.** The Applicant shall consult with the California Department of Fish and Wildlife on obtaining an Incidental Take Permit (ITP), per California Fish and Game Code 2081, for the take of Crotch's bumble bee. The Applicant shall provide the County with a copy of the ITP, or proof that an ITP is not required, prior to issuance of a grading permit. Mitigation for direct impacts to Crotch's bumble bee shall be fulfilled through compensatory mitigation at a minimum 1:1 nesting habitat replacement of equal or better functions and values to those impacted by the Project, or as otherwise determined through the Incidental Take Permit process. Mitigation shall be accomplished through the preservation of on-site suitable habitat (MM-4.4-1) and off-site suitable habitat (MM-4.4-9). The Applicant shall be obligated to implement all minimization and avoidance measures conditions that are included in the ITP.

Focused Survey**.** Focused surveys for Crotch's bumble bee (Bombus crotchii) shall be conducted within the construction footprint prior to the start of ground-disturbing construction activities. The focused surveys shall include a habitat assessment and focused surveys, both of which shall be as described in the Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species, released by the California Department of Fish and Wildlife (CDFW) on June 6, 2023, or the most current at the time of construction.

The habitat assessment shall, at a minimum, include historical and current species occurrences; document potential habitat on site including foraging, nesting, and/or overwintering resources; and identify which plant species are present. For the purposes of this mitigation measure, nest resources are defined as abandoned small mammal burrows, bunch grasses with a duff layer, thatch, hollow trees, brush piles, and human-made structures that may support bumble bee colonies, such as rock walls, rubble, and furniture. The habitat assessment shall be repeated prior to February 1 in each year that ground-disturbing activities will occur to determine if foraging, nesting, or overwintering resources are present within the impact area. If nesting resources are present in the impact area, focused surveys shall be conducted.

The focused survey shall be performed by a biologist with expertise in surveying for bumble bees and include at least three survey passes that are not on sequential days or in the same week, preferably spaced 2 to 4 weeks apart. The timing of these surveys shall coincide with the colony active period (April 1 through August 31 for Crotch's bumble bee). Surveys may occur between 1 hour after sunrise and 2 hours before sunset. Surveys shall not be conducted during wet conditions (e.g., foggy, raining, or drizzling), and surveyors shall wait at least 1 hour following rain. Optimal surveys are conducted when there are sunny to partly sunny skies and ambient temperatures are greater than 60° Fahrenheit. Surveys may be conducted earlier than April 1 if other bees or butterflies are flying. Surveys shall not be conducted when it is windy (i.e., sustained winds greater than 8 mph). Within non-developed habitats, the biologist shall look for nest resources suitable for bumble bee use. Ensuring that all nest resources receive 100% visual coverage, the biologist shall watch the nest resources for up to 5 minutes, looking for exiting or entering worker bumble bees. Worker bees should arrive and exit an active nest site with frequency, such that their presence would be apparent after 5 minutes of observation. If a bumble bee worker is detected, then a representative shall be identified to species. Biologists should be able to view several burrows at one time to sufficiently determine if bees are entering/exiting them depending on their proximity

to one another. It is up to the discretion of the biologist regarding the actual survey viewshed limits from the chosen vantage point that would provide 100% visual coverage; this could include a 30- to 50-foot-wide area. If a nest is suspected, the surveyor can block the entrance of the possible nest with a sterile vial or jar until nest activity is confirmed (no longer than 30 minutes).

Identification shall include trained biologists netting/capturing the representative bumble bee in appropriate insect nets, per the protocol in the U.S. National Protocol Framework for the Inventory and Monitoring of Bees. The bee shall be placed in a clear container for observation and photographic documentation if able. The bee shall be photographed using a macro lens from various angles to ensure recordation of key identifying characteristics. If bumble bee identifying characteristics cannot be adequately captured in the container due to movement, the container shall be placed in a cooler with ice until the bumble bee becomes inactive (generally within 15 minutes). Once inert, the bumble bee shall be removed from the container and placed on a white sheet of paper or card for examination and photographic documentation. The bumble bee shall be released into the same area from which it was captured upon completion of identification. Based on implementation of this method on a variety of other bumble bee species, they become active shortly after removal from the cold environment, so photography must be performed quickly.

If Crotch's bumble bee nests are not detected, no further mitigation would be required. The mere presence of foraging Crotch's bumble bees would not require implementation of additional minimization measures because they can forage up to 10 kilometers from their nests. If nest resources occupied by Crotch's bumble bee are detected within the construction area, no construction activities shall occur within 100 feet of the nest, or as determined by a qualified biologist through evaluation of topographic features or distribution of floral resources. The nest resources shall be avoided for the duration of the Crotch's bumble bee nesting period (February 1 through October 31). Outside of the nesting season, it is assumed that no live individuals would be present within the nest as the daughter queens (gynes) usually leave by September, and all other individuals (original queen, workers, males) die. The gyne is highly mobile and can independently disperse to outside of the construction footprint to surrounding open space areas that support suitable hibernacula resources.

A written survey report shall be submitted to the County of Los Angeles (County) and CDFW within 30 days of the pre-construction survey. The report shall include survey methods, weather conditions, and survey results, including a list of insect species observed and a figure showing the locations of any Crotch's bumble bee nest sites or individuals observed. The survey report shall include the qualifications/resumes of the surveyor(s) and approved biologist(s) for identification of photo vouchers and detailed habitat assessment. If Crotch's bumble bee nests are observed, the survey report shall also include recommendations for avoidance, and the location information shall be submitted to the California Natural Diversity Database at the time of, or prior to, submittal of the survey report.

If the nest resources cannot be avoided, as outlined in this measure, the project applicant shall consult with CDFW regarding the need to obtain an Incidental Take Permit. Any measures determined to be necessary through the Incidental Take Permit process to offset impacts to Crotch's bumble bee may supersede measures provided in this California Environmental Quality Act document and shall be incorporated into the Habitat Mitigation and Monitoring Plan.

MM-4.4-9 Off-Site Habitat Preservation. Prior to final map recordation, the Applicant shall obtain a letter of intent from the future Conservation Easement holder. Prior to issuance of a grading permit, the Applicant shall demonstrate recordation of a conservation easement, as defined by California Civil Code Section 815.1, that permanently preserves off-site habitat for long-term conservation and management ("off-site conservation area"). As part of recording the conservation easement for any off-site parcel(s), a Conservation Management Plan (CMP) applicable to the off-site conservation area shall be prepared and submitted to the Los Angeles County (County) Department of Regional Planning (Planning) for approval. The CMP shall identify the required resource management activities and the entities that shall be responsible for managing those activities in perpetuity. The conservation easement holder shall be an entity that has as part of its mission the protection of the environment, including lands, plant species, and/or wildlife species, and can be expected by its organization and history to remain in existence for the foreseeable future. The California Department of Fish and Wildlife (CDFW) per Government Code Section 65967(c) shall review the entity. The entity that holds the endowment shall first meet the criteria outlined in Government Code Section 65968(b). Funding for the conservation easement and implementation of the tasks in the CMP shall be maintained in perpetuity and shall be provided by a traditional endowment, establishing a community facilities district or landscape management district, or through contractual obligation with the Homeowners' Association or other equivalent mechanism(s).

One or more of the following options shall be used to provide adequate preservation for Project-related impacts to vegetation communities and wildlife habitat within the Significant Ecological Area (SEA) Ordinance Implementation Guide Resource Categories 1 and 3. The proposed off-site conservation area lands must support resources similar to those disturbed by the Project (i.e., sensitive vegetation communities, special-status plant and wildlife habitats, jurisdictional waters, and protected trees) and be connected with other natural open space areas. To determine that these conditions are present, the Applicant shall fund a biological resources assessment by a County Planning-approved Biologist for any parcel proposed for preservation, and the results of the assessment shall be submitted to County Planning for their approval to be used as mitigation.

In-Kind and Off-Site in the Santa Susana Mountains and Simi Hills Significant Ecological Area

For parcels within the SEA that support in-kind vegetation communities as those found in the Project site, the preservation ratios for each of the SEA Resource Categories listed would be in accordance with the SEA Ordinance Implementation Guide. The following table indicates the minimum preserved acres required for off-site preservation of in-kind vegetation communities (communities classified as the same as those being impacted by the Project) within the SEA.

In-Kind Vegetation Communities Preserved Off-Site in the Santa Susana Mountains and Simi Hills Significant Ecological Area

Alliance	Required In-Kind Preserved Acres
SEA Resource Category 1 (Mitigated at 5:1)	
Baccharis salicifolia Shrubland	11.65
Salix gooddingii–Salix laevigata Forest and Woodland	6.22
Sub-Total	*17.87*

In-Kind Vegetation Communities Preserved Off-Site in the Santa Susana Mountains and Simi Hills Significant Ecological Area

Alliance	Required In-Kind Preserved Acres
SEA Resource Category 3 (Mitigated at 3:1)	
Ericameria palmeri Provisional Shrubland	2.00
Eriodictyon crassifolium Provisional Shrubland	0.84[a]
Nassella (*Stipa*) spp.–*Melica* spp. Herbaceous	0.20
Quercus agrifolia Forest and Woodland	30.50[b]
Rhus trilobata–Crataegus rivularis–Forestiera pubescens Shrubland	0.07[a]
Sub-Total	*33.61*
Total	**51.48**

Notes: SEA = Significant Ecological Area.
[a] None would be needed if MM-4.4-2, Habitat Mitigation and Monitoring Plan, is implemented.
[b] 15.30 acres shall be needed if MM-4.4-2 is implemented.

Out-of-Kind and Within the Santa Susana Mountains and Simi Hills Significant Ecological Area

Preservation of out-of-kind vegetation communities (communities classified as being different than those being impacted by the Project) that are in the same group (defined by combinations of relatively narrow sets of diagnostic plant species (including dominant and co-dominant species, broadly similar composition, and diagnostic growth forms that reflect biogeographic differences in mesoclimate, geology, substrates, hydrology, and disturbance regimes as defined by the Federal Geographic Data Committee in the 2006 Draft National Vegetation Classification Standard) as the impacted vegetation communities (as defined by the National Vegetation Classification Standards) can be satisfied with the acquisition of parcels within the Santa Susana Mountains and Simi Hills SEA. For preserved lands within the same Resource Category, a multiplier of 1.5 shall be applied to increase lands for preservation, as shown in the following table. For preserved lands within a higher sensitivity Resource Category, a multiplier of 1.25 shall be applied, as shown in the following table. Lower sensitivity Resource Categories may not satisfy mitigation requirements for higher sensitivity Resource Categories. For the two Resource Category 1 communities, preservation shall be a riparian-associated vegetation community.

Out-of-Kind Vegetation Communities Preserved Within the Santa Susana Mountains and Simi Hills Significant Ecological Area

Alliance	Out-of-Kind-Same Resource Category Preserved Acres	Out-of-Kind-Higher Resource Category Preserved Acres
SEA Resource Category 1 (Mitigated at 5:1)	**1.5 Multiplier**	**1.25 Multiplier**
Baccharis salicifolia Shrubland	17.47	NA

Out-of-Kind Vegetation Communities Preserved Within the Santa Susana Mountains and Simi Hills Significant Ecological Area

Alliance	Out-of-Kind-Same Resource Category Preserved Acres	Out-of-Kind-Higher Resource Category Preserved Acres
Salix gooddingii–Salix laevigata Forest and Woodland	9.33	NA
Subtotal	*26.81*	*NA*
SEA Resource Category 3 (Mitigated at 3:1)	**1.5 Multiplier**	**1.25 Multiplier**
Ericameria palmeri Provisional Shrubland	3.00	2.50
Eriodictyon crassifolium Provisional Shrubland	1.26[a]	1.05[a]
Nassella (*Stipa*) spp.–*Melica* spp. Herbaceous	0.31	0.25
Quercus agrifolia Forest and Woodland	45.75[b]	38.13[c]
Rhus trilobata–Crataegus rivularis–Forestiera pubescens Shrubland	0.10[a]	0.08[a]
Subtotal	*50.42*	*42.01*
Total	**77.23**	**42.01**

Notes: NA = Not Applicable (due to there being no higher Resource Category)

[a] None would be needed if MM-4.4-2, Habitat Mitigation and Monitoring Plan, is implemented.

[b] 22.95 acres will need to be preserved if MM-4.4-2 is implemented.

[c] 19.13 acres will need to be preserved if MM-4.4-2 is implemented.

Vegetation Communities Preserved Within the Santa Clara River Significant Ecological Area

Off-site preservation within portions of the Santa Clara River SEA that are contiguous with the Santa Susana Mountains and Simi Hills SEA shall be considered if the area supports the same resource values as the Project site and is connected with other natural open space. Preservation of vegetation communities shall be acquired within the adjacent Santa Clara River SEA at a multiplier of 2 for in-kind preservation, multiplier of 2.5 for out-of-kind preservation but within the same Resource Category, and a multiplier of 2.25 for out-of-kind preservation but a higher level Resource Category, as shown in the following table. For the two Resource Category 1 communities, preservation shall be a riparian-associated vegetation community.

Vegetation Communities Preserved Within the Santa Clara River Significant Ecological Area

Alliance	In-Kind Preserved Acres	Out-of-Kind-Same Resource Category Preserved Acres	Out-of-Kind-Higher Resource Category Preserved Acres
SEA Resource Category 1 (Mitigated at 5:1)	**2 Multiplier**	**2.5 Multiplier**	**2.25 Multiplier**
Baccharis salicifolia Shrubland	23.30	29.12	NA
Salix gooddingii–Salix laevigata Forest and Woodland	12.45	15.56	NA
Sub-Total	*35.74*	*44.68*	*NA*
SEA Resource Category 3 (Mitigated at 3:1)	**2 Multiplier**	**2.5 Multiplier**	**2.25 Multiplier**
Ericameria palmeri Provisional Shrubland	4.00	5.00	4.50
Eriodictyon crassifolium Provisional Shrubland	1.67[a]	2.09[a]	1.88[a]
Nassella (Stipa) spp.–*Melica* spp. *Herbaceous*	0.41	0.51	0.46
Quercus agrifolia Forest and Woodland	61.00[b]	76.25[c]	68.63[d]
Rhus trilobata–Crataegus rivularis–Forestiera *pubescens* Shrubland	0.13[a]	0.17[a]	0.15[a]
Sub-Total	*67.21*	*84.02*	*75.62*
Total	**102.95**	**128.70**	**75.62**

Notes: NA = Not Applicable (due to there being no higher Resource Category

1 None would be needed to be preserved off-site if MM-4.4-2 is implemented.
2 29.16 acres would be needed if MM-4.4-2 is implemented.
3 36.45 acres would be needed to be preserved if MM-4.4-2 is implemented.
4 32.81 acres would be needed to be preserved if MM-4.4-2 is implemented.

Preservation of Assessor's Parcel Numbers 2826-018-034, 2826-017-044, 2826-017-043, 2826-017-041, 2826-014-057, and 2826-014-067

The six parcels are located within the Santa Susana Mountains/Simi Hills SEA, approximately one mile south-southwest of the Project site.

Nine vegetation communities were mapped in the six parcels, as listed in the table below. Two SEA Resource Category 3 communities, *Pseudotsuga macrocarpa–Quercus agrifolia* association (bigcone Douglas fir–coast live oak forest) and *Quercus agrifolia* association (coast live oak woodland and forest) occur, primarily on north-facing slopes and canyon bottoms. The seven SEA Resource Category 4 communities are shrub-dominated and consist of chaparral and coastal scrub species.

Assessor's Parcels Numbers 2826-018-034, 2826-017-044, 2826-017-043, 2826-017-041, 2826-014-057, and 2826-014-067

Vegetation Community	Acres
SEA Resource Category 1	
Quercus agrifolia Association Southern Coast Live Oak Riparian Forest (Water Resources)	27.47
SEA Resource Category 3	
Pseudotsuga macrocarpa–Quercus agrifolia Association	4.02
Quercus agrifolia Association	50.89
Subtotal	*54.91*
SEA Resource Category 4	
Adenostoma fasciculatum–Salvia leucophylla Association	11.35
Adenostoma fasciculatum–Salvia mellifera Mixed Shrub Association	1.16
Adenostoma fasciculatum Association	77.08
Artemisia californica–Eriogonum fasciculatum Association	2.08
Ceanothus crassifolius–Adenostoma fasciculatum–Rhus ovata Association	249.26
Ceanothus crassifolius–Adenostoma fasciculatum Association	14.37
Malacothamnus fasciculatus–Salvia leucophylla Association	2.54
Malosma laurina–Eriogonum fasciculatum Association	12.93
Wild oats and annual brome grasslands Semi-natural Alliance	12.24
Subtotal	*383.01*
SEA Resource Category	
Urban/Developed	1.31
Total	**466.70**

Note: SEA = Significant Ecological Area.

The drainages in the six parcels are part of the Wiley Canyon and Towsley Canyon watersheds that contribute to the South Fork of the Santa Clara River. The desktop analysis resulted in 13.30 acres of potential streams in the six parcels. The method for determining potential adjacent riparian oak forest resulted in 27.47 acres of SEA Category 1 Water Resources. The remaining 54.91 acres of *Pseudotsuga macrocarpa–Quercus agrifolia* association and *Quercus agrifolia* association would be considered upland and SEA Resource Category 3.

As shown in the following table, the off-site conservation area provides sufficient acreage to fully offset impacts to SEA Resource Category 4 vegetation communities (for SEA Resource Category 4, preservation can be out-of-kind if the resource is of the same category) and to partially offset impacts to SEA Resource Category 3 (for this discussion, the creation of vegetation communities

within the *Brassica nigra–Centaurea melitensis* herbaceous semi-natural stands is not included; however, if oak trees are planted as replacement for SEA protected trees, then an argument shall be made that planted oaks also constitute the creation of oak woodland). The 27.47 acres of SEA Category 1 Water Resources and the 54.91 acres of SEA Resource Category 3 provides the necessary acres of preservation for these two categories. The parcels provide an additional 26.72 acres of SEA Resource Category 3 vegetation communities and 503.17 acres of SEA Resource Category 4 vegetation communities.

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Impacts to SEA Resource Category Communities and Proposed Preservation for the Trails at Lyons Canyon Project Using APNs 2826-018-034, 2826-017-044, 2826-017-043, 2826-017-041, 2826-014-057, and 2826-014-067

SEA Resource Category	Total Impacts (acres)	Mitigation Requirement (acres)[a]	On-Site Preservation (acres)[b]	In-Kind Off-Site Preserved Acres Needed[c]	In-Kind Acres Provided by the Six Parcels[d]	Out-of-Kind Off-Site Preserved Acres Needed[e]	Out-of-Kind Acres Provided by the Six Parcels[f]	Total Preservation (acres)	Excess Acreage	Preservation to Impact Ratio: Required	Preservation to Impact Ratio: Provided
1	3.68	18.39	0.52	17.87	0	26.74	27.47	27.99	9.60	7.5:1	7.6:1
3	14.77	44.31	10.79	33.52	30.14[g]	5.07	24.77[h]	65.70	21.39	4.5:1	4.45:1
4[i]	32.40	64.80	115.78	0	383.01	NA	NA	498.79	433.99	3:1	15.4:1
5[j]	35.61	NA	16.24[k]	NA	NA	NA	NA	NA	NA	NA	NA

Notes: SEA = Significant Ecological Area; APN = Assessor's Parcel Number; NA = not applicable.

[a] This is determined by the impacts multiplied by the ratio of preservation required per the County of Los Angeles' SEA Implementation Guide (5:1 for Category 1, 3:1 for Category 3, and 2:1 for Category 4).

[b] Preserved in the Conservation Area established by the proposed MM-4.4-1.

[c] In-kind preservation within the Santa Susana Mountains/Simi Hills SEA, per proposed MM-4.4-2.

[d] APNs 2826-018-034, 2826-017-044, 2826-017-043, and 2826-017-041.

[e] Out-of-kind preservation within the Santa Susana Mountains/Simi Hills SEA is at 1.5:1 for same category (used for SEA Resources Category 1) and 1.25:1 for a higher category (used for SEA Resources Category 3), per proposed MM-4.4-2.

[f] Out-of-kind preservation of SEA Resource Category 1 (oak riparian forest).

[g] In the form of *Quercus agrifolia* Association.

[h] *Quercus agrifolia* Association preservation used for Project impacts to *Ericameria palmeri* Provisional Shrubland Alliance, *Eriodictyon crassifolium* Provisional Shrubland Alliance, *Nassella* [*Stipa*] spp. - *Melica* spp. Herbaceous Alliance, and *Rhus trilobata* - *Crataegus rivularis* - *Forestiera pubescens* Shrubland Alliance.

[i] For SEA Resource Category 4, preservation can be out-of-kind if the resource is of the same category.

[j] No preservation ratio is needed for SEA Resource Category 5, per se, only that the values that it supports (such as movement opportunities) are preserved.

[k] This would be transformed to a higher value SEA Resource Category if MM-4.4-2 is implemented.

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Mitigation Bank Credits

Off-site purchase of mitigation credit from a County Planning-approved mitigation bank shall be completed prior to the issuance of grading permits. The mitigation bank would have to be located within the Santa Susana Mountains and Simi Hills SEA or be contiguous with the SEA. The credits purchased must meet the acres calculated by using a multiplier of 3 applied to the preservation ratios stated in the SEA Ordinance Implementation Guide for SEA Resource Categories 1 and 3, as shown in the following table.

Mitigation Credits Required to be Purchased from a County-Approved Mitigation Bank

SEA Resource Category	Mitigations Credits Required
1	53.61[a]
3	100.83[b,c]

Notes: County = County of Los Angeles; SEA = Significant Ecological Area.
[a] Riparian scrub.
[b] 91.50 woodland, 8.72 shrubland, and 0.61 grassland
[c] 45.90 woodland, 6.01 shrubland, and 0.61 grassland (totaling 52.52) would be needed if MM-4.4-2 is implemented.

Mitigation lands shall consist of similar or higher quality habitat than found on the Project site. Should credits not be available, then compensation may be in the form a County-approved turnkey project with a mitigation bank and/or other County Planning-approved option. Selected mitigation banks shall be accredited through CDFW and/or the County to have established conservation easements that shall ensure the preservation of the resources in perpetuity.

MM-4.4-10 Special-Status Wildlife Relocation Plan. Prior to commencement of any earthmoving activities or the pre-construction staging of equipment on the Project site, the Project Applicant shall contract with a biologist approved by the County of Los Angeles (County) to develop a Pre-construction Wildlife Survey and Relocation Plan for terrestrial reptiles, including the California newt (*Taricha torosa*), two-striped gartersnake (*Thamnophis hammondii*), Southern California legless lizard (*Anniella stebbinsi*), and coastal whiptail (*Aspidoscelis tigris stejnegeri*). The Pre-construction Wildlife Survey and Relocation Plan shall be submitted to the County for review prior to any ground-disturbing activities within potentially occupied habitat.

The plan shall include at a minimum, the following:

- Protocols for pre-construction surveys to flush out and/or move identified special-status wildlife within the Study Area, as feasible
  - Relocation to the Conservation Area shall be the primary location, unless otherwise approved by the County
- The timing, frequency, and locations where surveys should be conducted
  - Surveys shall be conducted 24 hours prior to construction activities and repeated the morning of the proposed activity
  - Surveys shall be conducted in all areas anticipated to be subject to vegetation clearing
- The habitat and conditions in the proposed relocation site(s)

- The methods that would be used for trapping and relocating identified species
  - All equipment used in the effort shall be cleaned and decontaminated to minimize the spread of herpetofaunal pathogens (per the 2020 article by Julian et al. in the Herpetological Review, Minimizing the Spread of Herpetofaunal Pathogens in Aquatic Habitats by Decontaminating Construction Equipment)
  - Any wildlife handling and relocation methodology from the Streambed Alteration Agreement issued by the California Department of Fish and Wildlife (CDFW) shall be incorporated in the Pre-construction Survey and Relocation Plan
- Protocols for documentation/recordation of the species and number of animals relocated
  - Relocations shall be logged and made available to the County, if requested
- Protocols for notifying CDFW if identified species cannot be relocated
  - Attempts at relocation shall be logged, and notification shall occur within 24 hours
- The timing and frequency of reports documenting the results of the surveys

MM-4.4-11 Nesting Bird Avoidance. Project construction shall be conducted in compliance with the conditions set forth in the Migratory Bird Treaty Act and California Fish and Game Code with methods approved by the California Department of Fish and Wildlife to protect active bird/raptor nests. Vegetation removal shall occur during the non-breeding season for nesting birds (generally late September to early March) and nesting raptors (generally early July to late January) to avoid impacts to nesting birds and raptors.

For the remaining Project activities initiated during the breeding season for nesting birds (March 1–September 30) and nesting raptors (February 1–June 30), a pre-construction survey shall be conducted by the Biological Monitor (MM-4.4-4) for nesting birds and/or raptors within 3 days prior to any work within 300 feet for suitable nesting habitat for non-raptors and within 500 feet for suitable nesting habitat for raptors). If the Biological Monitoring does not find any active nests or immediately adjacent to the impact areas, the Project activity shall be allowed to proceed.

If the Biological Monitor finds an active nest adjacent to the construction area and determines that the nest may be indirectly impacted or breeding activities substantially disrupted, the Biological Monitor shall delineate an appropriate buffer zone around the nest depending on the sensitivity of the species and the nature of the construction activity. Any nest found during survey efforts shall be mapped on the construction plans, which will be included in the report(s) documenting the survey(s) that will be submitted to the County within three days of the completion of the survey. The active nest shall be protected until nesting activity has ended. To protect any nest site, the following restrictions to construction activities shall be required until nests are no longer active, as determined by the Biological Monitor: (1) work limits shall be established within a buffer around any occupied nest (the buffer shall be 100–300 feet for nesting non-raptors and 300–500 feet for nesting raptors), unless otherwise determined by the Biological Monitor and (2) access and surveying shall be restricted within the buffer of any occupied nest, unless otherwise determined by the Biological Monitor. Encroachment into the buffer area around a known nest shall only be allowed if the Biological Monitor determines that the proposed activity would not disturb the nest occupants. Construction can proceed when the Biological Monitor has determined that fledglings have left the nest, or the nest has failed.

MM-4.4-12 Lighting Plan. Prior to issuance of the building permit, the Applicant shall prepare lighting plans for submission and approval by the Los Angeles County (County) Department of Regional Planning (Planning) that identify the type, layout, and luminaire wattage of all exterior fixtures to be employed in association with the Project. The plan shall demonstrate compliance with Chapter 22.80 (Rural Outdoor Lighting District) of the County Code. The lighting plan shall at a minimum address and conform to the Rural Outdoor Lighting District as well as the following requirements, and Planning must approve all aspects of the final submitted lighting plans.

- Wherever feasible and compatible with requirements for nighttime safety and security, outdoor lighting shall be not be operated adjacent to native habitats.
- Outdoor lighting shall be fully shielded so that bulbs and lenses are not visible and shall cause no light trespass into native habitats or skyward. No lighting shall be directed toward native habitats.
- Light fixtures shall be mounted as low as possible to minimize light trespass.
- The lowest amount of light shall be employed that is needed for the task. The lighting shall only illuminate the area needed and shall be no brighter than necessary. This includes lighting for stage events.
- Motion sensors or automatic controls shall be employed to ensure that lights are not left on longer than necessary.
- Only warm light sources shall be used for outdoor lighting. The amount of blue light emitted shall be minimized, as blue light has been shown to harm human health and endanger wildlife. Warm (or subdued) light sources recommended for use outdoors include low-pressure sodium, high-pressure sodium, and low-color-temperature LEDs. Wherever feasible, lighting color temperature shall not exceed 2,200 kelvins.
- The following types of lighting are prohibited and shall not be used: drop-down lenses, mercury vapor lights, ultraviolet lights, searchlights, laser lights, or other outdoor lighting that flashes, blinks, alternates, or moves.
- Project structures shall utilize non-reflective materials to avoid glare intruding into native habitats.
- Landscape screens shall be employed where feasible to reduce glare from vehicle headlights into native habitats.

MM-4.4-13 Homeowners' Association Covenants, Conditions, and Restrictions. The Homeowners' Association (HOA) Covenants, Conditions, and Restrictions (CC&Rs), which are reviewed and approved prior to final map recordation, then recorded immediately after the final map records, shall include the following requirements to reduce potential human impacts on adjacent habitats and wildlife species:

- Invasive plant species (designated by the California Invasive Plant Council) shall be prohibited on all residential lots, as they could establish off site and have negative impacts to the adjacent habitats.
- All trash/garbage waste and recycling receptacles shall have locking devices that discourage wildlife foraging in common areas/parks and shall encourage the use of such locking devices on residential receptacles, as feasible.

- Intentional feeding of wildlife, including mule deer, is prohibited.
- The use of rodenticides is prohibited.
- Speed limits of 15 to 25 mph shall be posted, and the CCRs shall require residents to comply with the posted speed limits.
- Smoking shall be prohibited in open space areas.
- The HOA shall not use balloons for any community events, and the use of balloons by individual homeowners shall be discouraged.
- Homeowner reprisals against native wildlife species (i.e., killing or harming native wildlife species in any way) if homeowner pets are killed or harmed by wildlife shall be prohibited.

Public information signage shall be installed at the trailhead and in the recreation facility, and printed information shall be provided to the HOA in order to (1) educate and inform the public about wildlife, especially mountain lions present in the area; (2) advise on proper avoidance measures to reduce human-wildlife conflicts; (3) advise on proper use of open space trails in a manner respectful to wildlife (e.g., dogs on leash, proper waste disposal); and (4) provide local contact information to report injured or dead wildlife. Signage should be written in the language(s) understandable to all those likely to recreate and use the trails. Signage should not be made of materials harmful to wildlife.

3.4.2 4.4b Sensitive Natural Communities

Impact 4.4b Would the project have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.4-50 through 4.4-53.)

Facts in Support of Finding: Direct impacts to vegetation communities and land covers would occur due to removal of vegetation and alteration of soils from grading due to development of the Project. Additional impacts to *Brassica nigra–Centaurea melitensis* (vegetation community) would occur due to proposed habitat restoration in the Conservation Area.

With the implementation of MM-4.4-1, the remaining vegetation communities on the Project site outside of the Project footprint, within the Conservation Area, would be preserved in perpetuity. MM-4.4-9 would provide preservation of vegetation communities or appropriate similar communities with comparable ecological value in off-site parcels that would have conservation easements established. MM-4.4-2 would be implemented to restore and enhance these preserved vegetation communities. As such, MM-4.4-1, MM-4.4-2, and MM-4.4-9 would provide sufficient preservation to comply with the SEA Ordinance, and direct impacts to sensitive vegetation communities would be reduced to less than significant with mitigation.

Implementation of MM-4.4-4, MM-4.4-5, and MM-4.4-6 would avoid inadvertent impacts to vegetation communities by providing an on-site biologist to ensure mitigation measures are implemented, confining Project activities to the defined Project footprint and avoiding the introduction of invasive plant species. Temporary impacts could occur from generation of fugitive dust during construction that could cover leaves and limit photosynthesis; however, it is expected the Project would comply with the SCAQMD's Rule 403 (Fugitive Dust). With the implementation of MM-4.4-4, MM-

4.4-5, and MM-4.4-6, inadvertent direct impacts to SEA Resources would be avoided and minimized, and inadvertent direct impacts to sensitive vegetation communities would be reduced to less than significant with mitigation.

Indirect impacts could occur through the introduction of invasive, non-native plant species for the long-term landscaping of the completed Project. MM-4.4-7 would require that steps be taken to avoid and minimize the introduction of invasive, non-native plant species during construction and operation of the Project. Indirect impacts could also occur during the operations of the Project by the residents of the proposed housing. MM-4.4-12 would provide a lighting plan that would adhere to the Rural Outdoor Lighting District requirements. MM-4.4-13 would provide rules that avoid and minimize actions by the residents that could be detrimental. With the implementation of MM-4.4-7, MM-4.4-12, and MM-4.4-13, and compliance with existing, applicable regulations, indirect impacts to vegetation communities would be reduced to less than significant with mitigation. (DEIR, pp. 4.4-50 through 4.4-53.)

Mitigation Measures:

MM-4.4-1 On-Site Habitat Preservation.

MM-4.4-2 Habitat Mitigation and Monitoring Plan.

MM-4.4-4 Biological Monitoring.

MM-4.4-5 Demarcation of Disturbance Limits.

MM-4.4-6 Invasive Species Prevention.

MM-4.4-7 Landscaping Plan.

MM-4.4-9 Off-Site Habitat Preservation.

MM-4.4-12 Lighting Plan.

MM-4.4-13 Homeowners' Association Covenants, Conditions, and Restrictions.

3.4.3 4.4c Wetlands

Impact 4.4c Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.4-54 through 4.4-55.)

Facts in Support of Finding: Direct impacts to potential jurisdictional waters and associated riparian vegetation would occur due to vegetation removal and grading. The Project would impact potential jurisdictional waters, none of which support wetlands. The Project site includes additional areas of potential U.S. Army Corps of Engineers (USACE) jurisdiction where impacts would not occur, including approximately 0.66 acres of non-wetland waters preserved within the On-Site Conservation Area. Impacts to potential jurisdictional waters would be a significant impact under CEQA and would not be compatible with SEA Resources. Implementation of MM-4.4-14, Jurisdictional Waters Compensation, would require off-site compensation to offset the loss of on-site jurisdictional waters and

implementation of MM-4.4-1 and MM-4.4-9. MM-4.4-1 would demonstrate recordation of a conservation easement for the Conservation Area, with the remaining on-site jurisdictional waters. MM-4.4-3 would provide a program to collect, propagate, and disseminate these species into the Conservation Area. MM-4.4-9 may provide additional preservation of jurisdictional waters in off-site parcels. MM-4.4-4 would provide monitoring to avoid any inadvertent impacts to potential jurisdictional waters and the implementation of mitigation measures. MM-4.4-5 would delineate the Project footprint to help avoid any inadvertent impacts to jurisdictional waters and to confine impacts to the approved limits of construction. MM-4.4-6 and MM-4.4-7 would avoid and minimize the introduction of non-native plant species to jurisdictional waters. As such, implementation of MM-4.4-1, MM-4.4-3, MM-4.4-4, MM-4.4-5, MM-4.4-6, MM-4.4-7, MM-4.4-9, and MM-4.4-14 would reduce impacts to jurisdictional waters to less than significant with mitigation. (DEIR, pp. 4.4-54 through 4.4-55.)

Mitigation Measures:

MM-4.4-1 On-Site Habitat Preservation.

MM-4.4-3 Special-Status Plants Seed and Bulb Survey, Salvage, and Translocation.

MM-4.4-4 Biological Monitoring.

MM-4.4-5 Demarcation of Disturbance Limits.

MM-4.4-6 Invasive Species Prevention.

MM-4.4-7 Landscaping Plan.

MM-4.4-9 Off-Site Habitat Preservation.

MM-4.4-14 Jurisdictional Waters Compensation. Mitigation for up to 4.94 acres of direct impacts to jurisdictional waters shall be implemented through on-site enhancement of remaining jurisdictional waters (per MM-4.4-3) and/or off-site acquisition, such as mitigation bank credits and/or turnkey projects with mitigation banks (as approved by the County of Los Angeles) following the issuance of permits from the U.S. Army Corps of Engineers, Los Angeles Regional Water Quality Control Board, and California Department of Fish and Wildlife, and prior to the issuance of the grading permit.

3.4.4 4.4d Native Migratory Fish or Wildlife Species

Impact 4.4d Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Finding: Less Than Significant Impact with Mitigation (DEIR, p. 4.4-56.)

Facts in Support of Finding: The Project would potentially impact local wildlife movement by impeding localized movement from undeveloped land in the southern portion of the Project site, privately owned undeveloped lands to the west, and dedicated open space associated with Santa Clarita Woodlands Park and the Rivendale Open Space, to the undeveloped box canyon located within the northwestern portion of the Project site, which extends

an additional approximately 0.5 miles to the northwest before terminating at an existing development associated with the Stevenson Ranch development. No nursery sites were identified on the site; thus, the Project would not impact any nursery sites.

Dedication of the On-Site Conservation Area (MM-4.4-1, as managed in perpetuity through a conservation easement) would protect in perpetuity a valuable (but presently unprotected) connection between large tracts of conserved natural open space associated with the Santa Clarita Woodlands Park and the Rivendale Open Space, contributing to a contiguous corridor of conserved natural open space that connects lands to the west to the Calgrove Boulevard undercrossing, a recognized undercrossing of I-5 that supports east/west movement between the Santa Susana Mountains/Simi Hills SEA and the Gateway Ranch Open Space, Gates King Open Space, and San Gabriel Mountains to the east, therefore preserving, and thereby avoiding further encroachment on, movement opportunities between regional conserved habitat blocks and reducing potential Project impacts to SEA Resources. As such, with the implementation of MM-4.4-1, impacts to the SEA Resources and wildlife movement due to habitat fragmentation would be reduced to less than significant with mitigation.

The colonial roost of canyon bats detected during focused bat roost surveys within the On-Site Conservation Area is approximately 400 feet west of the Project footprint. This roost would not be directly impacted by the Project; however, noise from Project construction and night lighting from Project operation could cause indirect impacts. Implementation of MM-4.4-15, Roosting Bat Survey, would require a roosting bat survey to determine if the roost is still present. If present, MM-4.4-4 would require the roost to be monitored during Project construction activities, and MM-4.4-12 would require a lighting plan that prohibits lighting being focused into the open space areas. With mitigation impacts to bats would be reduced to less than significant. (DEIR, p. 4.4-56.)

Mitigation Measures:

MM-4.4-1 On-Site Habitat Preservation.

MM-4.4-4 Biological Monitoring.

MM-4.4-12 Lighting Plan.

MM-4.4-15 Roosting Bat Survey. If Project construction initiates between June 1 and August 30, a Los Angeles County Department of Regional Planning (LACDRP)-approved Biological Monitor shall conduct a pre-construction roosting bat survey within one week prior to the start of construction-related activities for the Project. The biologist shall inspect cliff features that could have crevices used for roosting by a colony of canyon bat (*Parastrellus hesperus*) within 500 feet of proposed construction activities and then conduct a roost emergence survey at dusk for any potential roosting features found. Results of the surveys shall be documented in a report and submitted to LACDRP. As stated in MM-4.4-4, the Biological Monitor shall monitor any colonial roosts located within 500 feet from the Project limits.

3.4.5 4.4e Oak Woodlands

Impact 4.4e Would the project convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inches in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.).

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.4-56 through 4.4-57.)

Facts in Support of Finding: Direct impacts would occur to 12.95 acres of oak woodlands on the Project site, as defined by the County's Oak Woodlands Conservation Management Plan, and 1.57 acres in the off-site brush thinning zone, for a total of 14.52 acres. The County requires a 3:1 replacement ratio resulting in the need to preserve 43.56 acres. With the implementation of MM-4.4-1, the remaining oak woodland within the Conservation Area would be preserved in perpetuity. In addition, implementation of MM-4.4-9 would require the preservation of off-site oak woodland and MM-4.4-2 would be implemented to restore and enhance these preserved vegetation communities. MM-4.4-16 would require replacement trees be planted in the Conservation Area. As such, implementation of MM-4.4-1, MM-4.4-2, MM-4.4-9, and MM-4.4-16 would meet SEA guidelines recommended for preservation reducing impacts to below a level of significance. Implementation of MM-4.4-4, MM-4.4-5, MM-4.4-6, and MM-4.4-7 would avoid and minimize inadvertent impacts to SEA Resources. As such, implementation of MM-4.4-1, MM-4.4-2, MM-4.4-4, MM-4.4-5, MM-4.4-6, MM-4.4-7, MM-4.4-9, and MM-4.4-16 would reduce impacts to oak woodland to less than significant with mitigation. (DEIR, pp. 4.4-56 through 4.4-57.)

Mitigation Measures:

MM-4.4-1 On-Site Habitat Preservation.

MM-4.4-2 Habitat Mitigation and Monitoring Plan.

MM-4.4-4 Biological Monitoring.

MM-4.4-5 Demarcation of Disturbance Limits.

MM-4.4-6 Invasive Species Prevention.

MM-4.4-7 Landscaping Plan.

MM-4.4-9 Off-Site Habitat Preservation.

MM-4.4-16 SEA Protected Trees Replacement / Compensation. The required Conservation Management Plan (CMP) approved by the County of Los Angeles (County) shall include a Protected Tree Replacement Plan that shall dictate the establishment of replacement trees in the Conservation Area at the numbers specified in the following table. At a minimum, the removal of any SEA Protected Tree shall result in a minimum of two replacement plantings with 10:1 for Heritage Trees. Replacement trees shall be seedlings of the same species being removed and shall be planted within an area where suitable growing conditions are present and where the trees shall be able to remain in perpetuity, which may include the On-Site Conservation Area. The replacement trees shall be nurtured and maintained in a condition of good health and shall be monitored for a period of 7 years. If any of the replacement plantings fail during the monitoring period of 7 years, the Applicant shall be responsible for replanting and nurturing those new trees. The following table details the quantity of each species required for planting.

Summary of Individual Species Replacement Quantities

Scientific Name	Common Name	Total Impacted	Replacement Ratio	Total Replacement Required
Heteromeles arbutifolia	toyon	0	2:1	0
Juglans californica	Southern California black walnut	3	2:1	6
Populus fremontii	Fremont cottonwood	15	2:1	30
Quercus agrifolia	coast live oak	191	2:1	382
Quercus agrifolia (Heritage Tree)	coast live oak (Heritage Tree)	15	10:1	150
Quercus berberidifolia	scrub oak	1	2:1	2
Quercus lobata	valley oak	10	2:1	20
Quercus lobata (Heritage Tree)	valley oak (Heritage Tree)	2	10:1	20
Salix laevigata	red willow	24	2:1	48
Salix lasiolepis	arroyo willow	7	2:1	14
Sambucus nigra ssp. *caerulea*	blue elderberry	50	2:1	100
	Total	**318**	**Not Applicable**	**772**

It should be noted that mitigation can include the protection of undersized, naturally sprouted trees of the same species growing on site. In addition, per the County Code, the County may require additional mitigation and monitoring requirements following review of the Significant Ecological Area Conditional Use Permits. At a minimum, the County requires that the replacement trees need to be nurtured and maintained in a healthy condition and be monitored for a period of 7 years. If any of the replacement plantings fail during the monitoring period of 7 years, the Applicant shall be responsible for replanting and nurturing those new trees.

The Project Applicant must pay into the County Protected Tree Fund should there not be enough locations within the Conservation Area (on-site or off-site) or Project landscaped areas for replacement trees. As a last resort, the Protected Tree Fund payments shall be used by the County in accordance with County Code Section 22.102.070(F)(5).

3.4.6 4.4f Local Policies or Ordinances Protecting Biological Resources

Impact 4.4f

Would the project conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (County Code, Title 12, Ch. 12.36), the County Oak Tree Ordinance (County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (County Code, Title 22, Ch. 102), Specific Plans (County Code, Title 22, Ch. 22.46), Community Standards Districts (County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (County General Plan, Figure 9.3)?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.4-57 through 4.4-63.)

Facts in Support of Finding: The Project site contains 312 non-heritage, SEA-protected trees that would be impacted and 22 heritage trees that would be directly impacted by the Project. The 312 non-heritage tree impacts are comprised of 251 removals (trees that have a trunk on or within 2 feet of the grading limits that would be removed) and 11 encroachments (trees that are not removed, but root damage, soil excavation and compaction, grade changes, loss of canopy, and trunk wounds are anticipated), and 50 trees that are located within a debris basin.[2] The 22 heritage tree impacts consist of 17 heritage tree removals and 5 heritage tree encroachments. Trees in which the Project footprint encroaches into the TPZ are considered "directly impacted" by the Project, as set forth by the County's SEA Ordinance. Direct impacts include tree removal, root damage, soil excavation and compaction, grade changes, loss of canopy, and trunk wounds. Impacts to protected non-heritage and heritage trees would be considered as potentially significant due to substantially degrading the quality of the environment. Implementation of MM-4.4-16, SEA Protected Tree Replacement/Compensation, addresses SEA guidelines for recommended preservation, making the Project compatible with SEA Resources, and reduces proposed impacts to below a level of significance with mitigation.

The Project's On-Site Conservation Area preserves 144.43 acres of natural open space, representing approximately 62% of the Project site. In addition, the Project's off-site land/habitat preservation program within the Santa Susana Mountains SEA (the "Off-Site Conservation Area") results in the permanent preservation of an additional 465.39 acres of category 1-4 vegetation communities protected by the SEA ordinance, including 27.47 acres of oak woodland riparian habitat and 54.91 acres of non-riparian oak woodland habitat. As a result, the Project preserves SEA resources at a significantly higher impact-to-preservation ratio than is required by the SEA ordinance and implementing guidelines. Further, 16 preservation, avoidance, and minimization measures have been provided as a part of the Project (MM-4.4-1 through MM-4.4-16), including: conserving in perpetuity 611.13 acres of on-site and off-site natural open space; requiring pre-construction surveys, planning, and biological monitoring during construction; measures protecting against invasive species establishment and spread; preparation of conservation management plans; the provision of an endowment for the permanent maintenance of all conservation areas; nesting bird avoidance; conducting a special status plant seed and bulb survey; and strategically locating development as close as possible to existing urban uses/infrastructure. With the implementation of MM-4.4-1, MM-4.4-2, and MM-4.4-9, impacts to natural open space areas and long-term maintenance of ecosystem functions would be reduced to less than significant. With the implementation of MM-4.4-1, impacts to the SEA Resources and wildlife movement due to habitat fragmentation would be reduced to less than significant. With implementation of MM-4.4-1, MM-4.4-4, MM-4.4-5, MM-4.4-6, MM-4.4-7, MM-4.4-12, and MM-4.4-13, impacts to the SEA Resources and wildlife movement due to edge effects would be reduced to less than significant.

Biological monitoring during vegetation removal and grading and the demarcation of the limits of construction would avoid and minimize inadvertent impacts to the On-Site Conservation Area and adjacent open space. Requiring an invasive species prevention plan and landscaping plan to be approved by the County would avoid and minimize indirect impacts to the On-Site Conservation Area and adjacent open space areas from the introduction of non-native plants. Requiring Covenants, Conditions, and Restrictions for the HOA that prohibit detrimental activities to the On-Site Conservation Area would avoid and minimize edge effects during the operation of the completed Project.

[2] It should be noted that the 50 trees located within the debris basin are not planned for removal as a result of the Project but are considered as removals for mitigation purposes because they could be impacted and removed due to the potential of future damage as a result of the creation of the debris basins and associated flooding.

The Project site has impacts to Priority Biological Resources (SEA Resource Categories 1 through 3) in the form special-status plants and wildlife, water resources, vegetation communities, and oak woodland. Preservation measures (MM-4.4-1, MM-4.4-2, and MM-4.4-9) and avoidance and minimization measures (MM-4.4-4 through MM-4.4-8 and MM-4.4-10) have been provided to preserve and limit impacts to the remaining Priority Biological Resources in the Conservation Area. Off-site preservation would allow for additional Priority Biological Resources to be preserved. These preservation and avoidance measures would conserve in perpetuity 611.13 acres of on-site and off-site natural open space. As such, impacts to Priority Biological Resources would be reduced to less than significant with mitigation. (DEIR, pp. 4.4-57 through 4.4-63.)

Mitigation Measures:

MM-4.4-1 On-Site Habitat Preservation.

MM-4.4-2 Habitat Mitigation and Monitoring Plan.

MM-4.4-3 Special-Status Plants Seed and Bulb Survey, Salvage, and Translocation.

MM-4.4-4 Biological Monitoring.

MM-4.4-5 Demarcation of Disturbance Limits.

MM-4.4-6 Invasive Species Prevention.

MM-4.4-7 Landscaping Plan.

MM-4.4-8 Crotch's Bumble Bee Habitat Preservation and Minimization Measures.

MM-4.4-9 Off-Site Habitat Preservation.

MM-4.4-10 Special-Status Wildlife Relocation Plan.

MM-4.4-11 Nesting Bird Avoidance.

MM-4.4-12 Lighting Plan.

MM-4.4-13 Homeowners' Association Covenants, Conditions, and Restrictions.

MM-4.4-14 Jurisdictional Waters Compensation.

MM-4.4-15 Roosting Bat Survey.

MM-4.4-16 SEA Protected Trees Replacement / Compensation.

3.4.7 Cumulative Impacts – Biological Resources

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.4-63 through 4.4-68.)

Facts in Support of Finding: Most of the cumulative projects within the City of Santa Clarita involve the development of previously disturbed or developed lands that contain limited native vegetation, many of which are isolated from naturalized areas by surrounding development. As such, these cumulative projects would not be expected to support habitat that would be suitable for most special-status plant and wildlife species, sensitive natural communities, and other biological resources; therefore, incremental effects on these resources are not anticipated to be cumulatively considerable. The cumulative projects within the County are primarily within undeveloped areas that could support similar habitat and have similar biological constraints as the Project. Three cumulative projects are located within the same SEA (Santa Susana Mountains and Simi Hills SEA) as the Project. Each of the County's cumulative projects are proximate to existing residential development but are contiguous with large tracts of open space and have the potential to result in the incremental loss of habitat available to special-status plant and wildlife species. Therefore, the Project, in combination with the other County cumulative projects, could add to the cumulative loss of biological resources resulting in a significant cumulative impact. With implementation of MM-4.4-1 through MM-4.4-16, all Project-specific impacts would be reduced to less than significant. With implementation of the mitigation measures discussed above, the Project's incremental effect on biological resources would be reduced to less than significant and would not have a considerable contribution to the overall cumulative impact when viewed in connection with the effects of the cumulative projects. Therefore, the Project's incremental effect on biological resources would not be cumulatively considerable and cumulative impacts on biological resources would be less than significant with mitigation. (DEIR, pp. 4.4-63 through 4.4-68.)

Mitigation Measures:

MM-4.4-1 On-Site Habitat Preservation.

MM-4.4-2 Habitat Mitigation and Monitoring Plan.

MM-4.4-3 Special-Status Plants Seed and Bulb Survey, Salvage, and Translocation.

MM-4.4-4 Biological Monitoring.

MM-4.4-5 Demarcation of Disturbance Limits.

MM-4.4-6 Invasive Species Prevention.

MM-4.4-7 Landscaping Plan.

MM-4.4-8 Crotch's Bumble Bee Habitat Preservation and Minimization Measures.

MM-4.4-9 Off-Site Habitat Preservation.

MM-4.4-10 Special-Status Wildlife Relocation Plan.

MM-4.4-11 Nesting Bird Avoidance.

MM-4.4-12 Lighting Plan.

MM-4.4-13 Homeowners' Association Covenants, Conditions, and Restrictions.

MM-4.4-14 Jurisdictional Waters Compensation.

MM 4.4-15 Roosting Bat Survey.

MM-4.4-16 SEA Protected Trees Replacement / Compensation.

3.5 Cultural Resources

3.5.1 4.5a Historic Resources

Impact 4.5a Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.5-26 through 4.5-29.)

Facts in Support of Finding: No historical resources pursuant to CEQA Guidelines Section 15064.5 are known to exist with the Project site. However, based on the identification of cultural resources of both a prehistoric and historic nature located within and surrounding the Project, some of which meet the threshold of a historical resource, and the presence of intact native soils, the potential for proposed disturbances to impact unknown resources possessing traits consistent with the definition of a historical resource is possible. If yet unknown historical resources exist and are inadvertently encountered during implementation of the Project, there is potential for a substantial adverse change in the significance of an historical resource to occur, which would result in a potentially significant impact regarding a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. As such, MM-4.5-1, Archaeological Monitoring, and MM-4.5-2, WEAP Training, are required to reduce impacts to less than significant. MM-4.5-1 requires that cultural monitoring be conducted during initial ground disturbing activities, guided by a Cultural Resource Monitoring and Inadvertent Discovery Plan, that shall provide a protocol for the identification and proper treatment of historical resources. MM-4.5-2 requires development and implementation of a Workers Environmental Awareness Program Training aimed at instructing construction personnel instructed on the proper procedures to follow in the event that historical resources are encountered during ground-disturbing activities. With implementation of MM-4.5-1 and MM-4.5-2, the impact resulting in a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5 would be less than significant with mitigation. (DEIR, pp. 4.5-26 through 4.5-29.)

Mitigation Measures:

MM-4.5-1 Archaeological Monitoring. Prior to ground disturbance activities, the Applicant and/or subsequent responsible parties shall retain a Principal Investigator/Archaeologist, meeting the Secretary of the Interior's Standards, and with experience in California prehistoric and historic resources (experience within Los Angeles County preferred). The Principal Investigator/ Archaeologist shall do the following: (1) compose a Cultural Resource Monitoring and Inadvertent Discovery Plan (Plan); (2) manage archaeological monitoring; and (3) address any inadvertent discoveries identified during Project implementation. These actions are described further below.

1. ***Cultural Resource Monitoring and Inadvertent Discovery Plan.*** The Principal Investigator/Archaeologist shall compose the Plan to outline cultural monitoring protocols and a program of treatment and mitigation in the case of an inadvertent discovery of cultural resources during ground-disturbing activities. The Plan would be informed by the data and findings provided in the cultural report prepared for the Project (Appendix D), final grading and

site plans in order to provide guidance for the proper identification, evaluation, treatment, and protection of any cultural resources or human remains in accordance with California Environmental Quality Act (CEQA), as well as the depths at which cultural monitoring is required, throughout the duration of the Project. Existence and importance of adherence to this Plan shall be stated on all Project site plans intended for use by those conducting the ground disturbing activities.

2. ***Archaeological Monitoring.*** The Principal Investigator/Archaeologist shall manage archaeological monitoring activities conducted by technicians knowledgeable in archaeological resources during initial ground disturbances within native soils. Initial ground disturbance is defined as initial construction-related earth moving of sediments from their place of deposition. As it pertains to cultural monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by Project-related construction. The retained Principal Investigator/Archaeologist shall oversee and establish monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter cultural deposits or material. The archaeological monitors shall be responsible for maintaining daily monitoring logs. The requirement for archaeological monitoring shall be noted on all construction plans to ensure implementation. Upon completion of all ground disturbing activities and prior to release of the grading bond, an archaeological monitoring report shall be prepared within 60 days following completion of ground disturbance and submitted to the County of Los Angeles for review. This report shall document compliance with approved cultural mitigation, all monitoring efforts, and include an appendix with daily monitoring logs. The final report shall be submitted to the County and the South Central Coastal Information Center (SCCIC).

MM-4.5-2 Workers Environmental Awareness Program (WEAP) Training. Prior to the commencement of ground-disturbing activities for all phases of Project implementation, the Project Applicant shall retain a Principal Investigator/Archaeologist, as detailed in MM-4.5-1, above. The Principal Investigator/Archaeologist shall prepare a WEAP. The WEAP shall be submitted to the County of Los Angeles for review and approval. All construction personnel and monitors shall be presented the WEAP training prior to the start of ground-disturbing activities. This training shall inform all personnel working on the Project site about the archaeological sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant archaeological resources. The WEAP shall define "tribal cultural resources" and include appropriate management requirements relating to inadvertent discovery of a potential tribal cultural resource. Each worker should also be instructed on the proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the Principal Investigator/Archaeologist, and, if appropriate, Tribal representative as determined by the Principal Investigator/Archaeologist. Necessity of training attendance shall be stated on all Project site plans intended for use by those conducting the ground-disturbing activities.

3.5.2 4.5b Archaeological Resources

Impact 4.5b Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.5-29 through 4.5-30.)

Facts in Support of Finding: An archaeological literature and records search determined that 13 cultural/archeological resources have been previously recorded within 1-mile of the Project site and off-site improvement locations. All resources were assessed determined to not meet the criterion for significance in accordance with CEQA and not eligible for listing on the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR). No known significant archaeological resources, as defined by CEQA Section 15064.5, exist within the Project site.

However, based on the identification of archaeological resources of both a prehistoric and historic nature located within and surrounding the Project and the presence of potentially intact native soils, there would be potential for proposed disturbances to impact unknown archaeological resources. If yet unknown archaeological resources, possessing the characteristics outlined in CEQA as significant, exist, and are inadvertently encountered during construction of the Project, there is potential for a substantial adverse change in the significance of an archaeological resource to occur. Therefore, this would result in a potentially significant impact regarding a substantial adverse change in the significance of an unknown archaeological resource pursuant to CEQA Guidelines Section 15064.5. As such, the following mitigation measures are recommended to ensure that unknown archaeological resources that are inadvertently encountered during Project implementation are assessed, evaluated (if necessary) and treated in accordance with CEQA: MM-4.5-1 and MM-4.5-2. MM-4.5-1 requires that cultural monitoring be conducted during initial ground disturbing activities, guided by a Cultural Resource Monitoring and Inadvertent Discovery Plan, that shall provide a protocol for the identification and proper treatment of archaeological resources. MM-4.5-2 requires development and implementation of a Workers Environmental Awareness Program Training aimed at instructing construction personnel instructed on the proper procedures to follow in the event that archaeological resources are encountered during ground-disturbing activities. With the implementation of MM-4.5-1 and MM-4.5-2, impacts resulting in a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 would be less than significant with mitigation. (DEIR, pp. 4.5-29 through 4.5-30.)

Mitigation Measures:

MM-4.5-1 Archaeological Monitoring.

MM-4.5-2 Workers Environmental Awareness Program (WEAP) Training

3.5.3 4.5c Human Remains

Impact 4.5c Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Finding: Less Than Significant Impact with Mitigation (DEIR, p. 4.5-30.)

Facts in Support of Finding: No prehistoric or historic human remains or burial sites were identified within the Project site as a result of the records search, Native American Heritage Commission (NAHC) Sacred Land File search, or pedestrian survey. In the event that human remains are inadvertently encountered during construction activities, such resources would be treated in accordance with state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, California PRC Section 5097.98, and the California Code of Regulations Section 15064.5(e). Additionally, the following mitigation measures are recommended to ensure that unknown human remains and any associated archaeological resources that are inadvertently encountered during Project implementation are assessed, evaluated (if necessary) and treated in accordance with CEQA: MM-4.5-1 and MM-4.5-2. With implementation of MM-4.5-1 and MM-4.5-2, impacts to human remains, including those interred outside of dedicated cemeteries, would be less than significant with mitigation. (DEIR, p. 4.5-30.)

Mitigation Measures:

MM-4.5-1 Archaeological Monitoring.

MM-4.5-2 Workers Environmental Awareness Program (WEAP) Training

3.5.4 Cumulative Impacts – Cultural Resources

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.5-30 through 4.5-32.)

Facts in Support of Finding: There are no known significant historical or archaeological resources pursuant to CEQA Guidelines Section 15064.5 present on the Project site. Nor any prehistoric or historic human remains or burial sites. However, there is a potential for impacts to unidentified historic resources, archaeological resources, or human remains which would require implementation of MM-4.5-1 and MM-4.5-2. With mitigation, Project-specific impacts to cultural resources would be reduced to a less than significant level. Because all cultural resources are unique and nonrenewable resources, cumulative projects that demolish or alter historical resources have the potential to erode a general cultural landscape to which the historical resources belong. Therefore, the Project in combination with the cumulative projects could result in a cumulatively considerable impact on historical and cultural resources with regard to potential known and/or unknown historical resource at the Project site. Therefore, although cumulative development would have the potential to result in a significant impact associated with the loss of cultural resources through the physical demolition, destruction, relocation, or alteration of a resource or its immediate surroundings, the Project could also contribute to the cumulative impact. Compliance with MM-4.5-1 and MM-4.5-2 would ensure the Project's contribution would be reduced to less than significant with mitigation. (DEIR, pp. 4.5-30 through 4.5-32.)

Mitigation Measures:

MM-4.5-1 Archaeological Monitoring.

MM-4.5-2 Workers Environmental Awareness Program (WEAP) Training

3.6 Geology and Soils

3.6.1 4.7g Paleontological Resources

Impact 4.7g Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.7-20 through 4.7-21.)

Facts in Support of Finding: The Project's Geotechnical Report did not identify any unique geologic features on-site, meaning that the on-site deposits and features do not represent the best example of its type locally or regionally; do not embody distinctive characteristics of a geologic principle that is exclusive to the regional context; do not provide a key piece of geologic information important to geologic history; nor used as a teaching tool. As such, the Project would not result in direct or indirect impacts to a unique geologic feature.

Regarding unique paleontological resources or sites, shallow excavations within mapped areas of low paleontological resource sensitivity (e.g., younger, Holocene-age Quaternary alluvium) are unlikely to uncover any significant paleontological resources. According to the records search conducted for the Project, a single fossil yielded fossil invertebrates within the Project site. However, as stated in the Project's paleontological resources assessment, these fossils came from the Repetto Formation and are not anticipated to be impacted by the Project. Moreover, the Repetto Formation was not encountered during geotechnical investigations for the Project site. However, sedimentary deposits with high paleontological resources sensitivity (e.g., the Saugus and Pico Formations) would be impacted below native topsoil, artificial fill, or younger Quaternary alluvium, and therefore excavation within these areas may encounter important and unique paleontological resources.

Therefore, prior to implementation of mitigation the Project would result in a potentially significant impact regarding directly or indirectly destroying a unique paleontological resource or site. However, implementation of MM-4.7-1, Paleontological Monitoring, requires that a qualified paleontologist be retained to develop a Cultural and Paleontological Resource Monitoring and Inadvertent Discovery Plan (Plan), which would ensure that such excavations would be monitored, and significant resources that are uncovered (if any) would be recovered and protected, thus ensuring that such resources are not destroyed or lost. MM-4.7-2 requires that a WEAP be developed, and training be implemented based on the WEAP. With the implementation of MM-4.7-1 and MM-4.7-2, impacts resulting in the potential to directly or indirectly destroy a unique paleontological resource or site would be less than significant with mitigation. (DEIR, pp. 4.7-20 through 4.7-21.)

Mitigation Measures:

MM-4.7-1 Paleontological Monitoring. Prior to ground disturbance activities, the Applicant and/or subsequent responsible parties shall retain a Principal Investigator/Qualified Paleontologist that meets the standards of the Society for Vertebrate Paleontology (2010). The Principal Investigator/Qualified Paleontologist shall do the following: (1) compose a Paleontological Resource Monitoring and Inadvertent Discovery Plan (Plan); (2) manage paleontological monitoring; and (3) address any inadvertent discoveries identified during Project implementation. These actions are described further below.

1. **Paleontological Resource Monitoring and Inadvertent Discovery Plan.** The Principal Investigator/Qualified Paleontologist would compose the Plan to outline paleontological monitoring protocols and a program of treatment and mitigation in the case of an inadvertent discovery of paleontological resources during ground-disturbing activities. The Plan would be informed by the data and findings provided in the paleontological report prepared for the Project (Confidential Paleontological Resources Assessment Report, prepared by Environmental Science Associates, dated November 2021, as included as Appendix E-2 of this Draft Environmental Impact Report), final grading and site plans in order to provide guidance for the proper identification, evaluation, treatment, and protection of any paleontological resources in accordance with California Environmental Quality Act (CEQA) throughout the duration of the Project. Existence and importance of adherence to this Plan shall be stated on all Project site plans intended for use by those conducting the ground disturbing activities.
2. **Paleontological Monitoring.** The Principal Investigator/ Qualified Paleontologist shall manage paleontological monitoring activities conducted by technicians knowledgeable in paleontological resources during initial ground disturbances within native soils. Initial ground disturbance is defined as initial construction-related earth moving of sediments from their place of deposition. As it pertains to paleontological monitoring, this definition excludes movement of sediments after they have been initially disturbed or displaced by Project-related construction. The retained Principal Investigator/ Qualified Paleontologist shall oversee and establish monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for construction activities to encounter paleontological resources. The paleontological monitors shall be responsible for maintaining daily monitoring logs. The requirement for paleontological monitoring shall be noted on all construction plans to ensure implementation. Upon completion of all ground disturbing activities, a paleontological monitoring report shall be prepared within 60 days following completion of ground disturbance and submitted to the County of Los Angeles for review. This report shall document compliance with approved paleontological mitigation, all monitoring efforts, and include an appendix with daily monitoring logs.

MM-4.7-2 Workers Environmental Awareness Program (WEAP) Training. Prior to the commencement of ground-disturbing activities for all phases of Project implementation, the Project Applicant shall retain a Principal Investigator/Qualified Paleontologist. The Principal Investigator/Qualified Paleontologist shall prepare a WEAP. The WEAP shall be submitted to the County of Los Angeles for review and approval. All construction personnel and monitors shall be presented the WEAP training prior to the start of ground-disturbing activities. This training shall inform all personnel working on the Project site about the paleontological sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of paleontological materials that may be identified during construction of the Project and explain the importance of and legal basis for the protection of significant paleontological resources. Each worker should also be instructed on the proper procedures to follow in the event that paleontological resources are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection, and the immediate contact of the Principal Investigator/Qualified Paleontologist, if appropriate. Necessity of training attendance shall be stated on all Project site plans intended for use by those conducting the ground-disturbing activities.

3.6.2 Cumulative Impacts – Paleontological Resources

Finding: Less Than Significant Impact with Mitigation (DEIR, p. 4.7.24.)

Facts in Support of Finding: Regarding paleontological resources, most impacts are site-specific and are therefore generally mitigated on a project-by-project basis. Cumulative projects would be required to assess impacts to paleontological resources. Furthermore, the Project does not propose construction (including grading/excavation) or design features that could directly or indirectly contribute to an increase in a cumulative impact to paleontological resources, as the mitigation measure provided in this analysis ensures any significant paleontological resources uncovered during Project excavations would be properly analyzed and salvaged by a qualified paleontologist. Therefore, the Project, in combination with the past, present, and reasonably foreseeable future projects in the Project vicinity, would result in less than significant cumulative impacts to paleontological resources. (DEIR, p. 4.7.24.)

Mitigation Measures:

MM-4.7-1 Paleontological Monitoring.

MM-4.7-2 Workers Environmental Awareness Program (WEAP) Training

3.7 Greenhouse Gas Emissions

3.7.1 4.8a Generation of Direct or Indirect GHG Emissions

Impact 4.8a Would the project generate GHGs, either directly or indirectly, that may have a significant impact on the environment?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.8-30 through 4.8-35.)

Facts in Support of Finding: Construction/Operation. The Project's proposed GHG emissions during construction and operations would be over the County's 2045 Climate Action Plan (CAP)-based GHG-metric threshold of 2.42 metric tons of CO_2 equivalent (MT CO_2e) per person per year. This 2029 efficiency metric threshold reflects the trajectory planned for in the State's Scoping Plan, 2017 Scoping Plan Update, and 2022 Scoping Plan (i.e., Assembly Bill 32, Senate Bill 32, and Assembly Bill 1279). However, with implementation of MM-4.8-1 through MM 4.8-8 and MM-4.17-2, emissions during construction and operation of the Project would result in an efficiency metric less than the threshold. Since the Project's efficiency would be below the 2029 efficiency metric threshold, it would not interfere with attainment of the 2030, 2045, and 2050 statewide emission reduction targets, and therefore, would not interfere with the ability of the state and the County to achieve mid-term and long-term GHG reduction targets. Therefore, the impact related to the potential for the Project to generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment would be less than significant with mitigation. (DEIR, pp. 4.8-30 through 4.8-35.)

Mitigation Measures:

MM-4.8-1 Construction Emission Reductions. Prior to the issuance of grading permits, the Project Applicant or its designee shall implement the following strategies during construction activities and provide

evidence to the County that the Construction Contractor's contract specifications include the following strategies:

A. Use electric or hybrid powered equipment for generators and other small pieces of equipment (e.g., forklifts and saws), as commercially available.
B. Use cleaner-fuel equipment such as replacing diesel fuel with compressed natural gas (CNG) or renewable diesel, as commercially available.
C. Reduce idling time of heavy-duty trucks either by shutting them off when not in use or reducing the time of idling to no more than 3 minutes (5-minute limit is required by the state airborne toxics control measure 13 CCR Section 2485).

Commercially available equipment is herein defined as equipment sourced within 50 vehicle miles of the Project site and within 10 percent of the cost of the diesel-fueled-equivalent equipment. The Project Applicant must contact at least 3 contractors or vendors within Los Angeles County and submit to the County justification if the specified equipment is not commercially available. Compliance with this measure shall be documented and made available to the County upon request.

MM-4.8-2 Electrify Buildings. All the Project's buildings shall be powered fully by electricity, with no natural gas infrastructure or appliances, including no fireplaces. Prior to the issuance of building permits, the Project Applicant or its designee shall provide evidence to the County that the building design plans include no natural gas infrastructure.

MM-4.8-3 Energy Conservation. Prior to the issuance of building permits, the Project Applicant or its designee shall provide evidence to the County that the residential and recreational building design plans include the following energy conservation measures:

A. Install Energy Star-rated heating, cooling, lighting, and appliances.
B. Install a 7-kilowatt (kW) solar photovoltaic electric generating system at the recreation center.
C. Outdoor lighting shall be light emitting diodes (LED) or other high-efficiency lightbulbs.
D. Install Cool Pavement. Prior to the issuance of building permits, the Project applicant or its designee shall submit building plans illustrating installation of cool pavements in place of dark pavements. Outdoor pavements, such as walkways and patios, shall use paving materials with three-year SRI of 0.28 or initial SRI of 0.33.
E. Provide information on energy efficiency, energy efficient lighting and lighting control systems, energy management, and existing energy incentive programs to future residents of the Project.

MM-4.8-4 Utilize 100% Zero-Carbon Electricity. The Project shall require, through the Covenants, Conditions and Restrictions (CC&Rs), enforced by the homeowners' association, the use of 100% zero-carbon electricity procured through Southern California Edison (SCE) (SCE Green Rate) or other electricity provider for residences and the recreational center. This requirement shall be enforced until which time the electricity provided is 100% carbon-free for all accounts by default.

MM-4.8-5 Encourage Electric Vehicles. Prior to the issuance of building permits, the Project Applicant or its designee shall provide evidence to the County that the single-family residential building design plans incorporate the following:

A. The installation of a dedicated 208/240 branch circuit will be included in every single-family garage unit, and no-less-than 92 of the market-rate units will have one Level 2 (fast charger with 40-amp circuit) electric vehicle (EV) charging station in the garage.

MM-4.8-6 Water Use Efficiency and Water Conservation. Prior to the issuance of building permits, the Project Applicant or its designee shall provide evidence to the County that the residential and recreational building design plans include the following water use efficiency and conservation measures, including:

A. High-efficiency appliances/fixtures to reduce water use, and/or include water-efficient landscape design
B. Low-flow or high-efficiency water fixtures
C. Water-efficient landscapes with lower water demands than required by the California Department of Water Resources (DWR) 2015 Model Water Efficient Landscape Ordinance (MWELO)
D. Planting of native and drought-tolerant plant species only
E. Provide educational materials to future tenants and building occupants about water saving behaviors and water-conserving landscaping.

MM-4.8-7 Solid Waste Reduction. Prior to the issuance of building permits for the Project, the Project Applicant shall provide building plans that include the following solid waste reduction measure:

A. Provide storage areas for recyclables and organic waste in new construction, and food waste storage, if a pick-up service is available.

MM-4.8-8 Landscape Maintenance Equipment Emission Reductions. The Project Applicant shall implement the following landscape maintenance equipment reduction measures:

A. ***Outdoor Electrical Outlets.*** Prior to the issuance of building permits, the Project Applicant or its designee shall provide evidence to the County that the design plans include electrical outlets on the exterior of the structure to facilitate use of electrical lawn and garden equipment.
B. ***Encourage Utilization of Existing Yard Equipment Exchange and Rebate Programs.*** The Project's future homeowners' association shall educate future residents about the South Coast Air Quality Management District (SCAQMD) Electric Lawn Mower Rebate Program and the Commercial Electric Lawn and Garden Equipment Exchange Program. When conventional gasoline-powered yard equipment (e.g., lawn mowers, leaf blowers and vacuums, shredders, trimmers, and chain saw) are exchanged for electric and rechargeable battery-powered yard equipment, direct GHG emissions from fossil-fuel combustion are displaced by indirect GHG emissions associated with the generation of electricity used to power the equipment.

MM-4.17-2 Transportation Demand Management (TDM) Program. (See Transportation header under Section 3.)

3.7.2 4.8b Conflicts with an Applicable Plan, Policy, or Regulation

Impact 4.8b Would the project conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.8-35 through 4.8-61.)

Facts in Support of Finding: The Project would not conflict with the applicable GHG-related goals, policies, and objectives of the County's Climate Action Plan 2045, County's General Plan or OVOV. OurCounty's Goal 7 strives for a fossil-fuel free Los Angeles County in order to achieve a zero-carbon energy system and zero emission transportation system. The example target outlined in the OurCounty Plan for Goal 7 is to achieve carbon neutrality by 2050. The Project achieves substantial progress towards meeting a zero-carbon energy system and zero emission transportation system by providing solar energy to buildings and facilitating electric vehicles, which can use renewable, zero-emission electric power. The Project also includes solar, as required per the 2019 Title 24 standards, as well as additional solar on the recreation center in accordance with implementation of MM-4.8-3. MM-4.8-2 and MM-4.8-4 require the electrification of all buildings as well as the use of zero-carbon electricity. As such, the Project does not conflict with OurCounty's Goal 7. The Project would not conflict with the mandatory residential measures for EV charging spaces (see MM-4.8-5), low-impact development (see MM-4.8-6), cool roofs (see MM-4.8-3), and construction waste management (see MM-4.8-7). As the project would be built to all of the County's Green Building Standards, it would not conflict with the County's Green Building Standards. The Project would promote sustainability in land use design by developing adjacent to a transportation corridor and by encouraging walking, bicycling, and transit ridership to reduce vehicle miles traveled (VMT), and improve pedestrian infrastructure through sidewalk continuity and street connectivity, as required by MM-4.17-2 (Appendix J). The Project would comply with the strategy to promote diverse housing choices of the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) since it would result in the development of diverse housing types as well as new market-rate and affordable residential units to increase a mix of housing supply options.

The Project would support achievement of the Senate Bill 32, Executive Order S-3-05, and Assembly Bill 1279 goals through compliance with the County's 2045 CAP and with support of the strategies identified in SCAG's 2020-2045 RTP/SCS to reduce per capita GHG emissions. The Project would also not conflict with the County's General Plan, OVOV, County's Green Building Standards, and OurCounty Sustainability Plan. Nonetheless, without mitigation, the Project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Implementation of MM-4.8-1 through MM-4.8-8 and MM-4.17-2 would reduce potential conflicts with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases to less than significant. As such, the Project's potential to conflict with an applicable plan, policy, or regulation would be a less-than-significant impact with mitigation. (DEIR, pp. 4.8-35 through 4.8-61.)

Mitigation Measures:

MM-4.8-1 Construction Emission Reductions.

MM-4.8-2 Electrify Buildings.

MM-4.8-3 Energy Conservation.

MM-4.8-4 Utilize 100% Zero-Carbon Electricity.

MM-4.8-5 Encourage Electric Vehicles.

MM-4.8-6 Water Use Efficiency and Water Conservation.

MM-4.8-7 Solid Waste Reduction.

MM-4.8-8 Landscape Maintenance Equipment Emission Reductions.

MM-4.17-2 Transportation Demand Management (TDM) Program. (See Transportation header under Section 3.)

3.7.3 Cumulative Impacts – Greenhouse Gas Emissions

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.8-61 through 4.8-62.)

Facts in Support of Finding: Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs. GHG emissions inherently contribute to cumulative impacts, and thus, any additional GHG emissions would result in a cumulative impact. The County's General Plan EIR determined that cumulative GHG emissions impacts would remain significant and unavoidable. The Project would exceed the GHG threshold prior to mitigation, and cumulative impacts related to GHG emissions would be potentially significant. However, with mitigation, the Project's emissions would be less than the County's significance threshold. Additionally, with mitigation, the Project would not conflict with any applicable GHG reduction plans, including the County's CAP, County's General Plan, County's Green Building Code, the 2020-2045 RTP/SCS, and CARB's Scoping Plan. Therefore, with MM-4.8-1 through MM-4.8-8 and MM-4.17-2, the Project would not make a cumulatively considerable contribution to a cumulative impact with regard to generation of GHG emissions and the cumulative impact would be less than significant with mitigation. (DEIR, pp. 4.8-61 through 4.8-62.)

Mitigation Measures:

MM-4.8-1 Construction Emissions Reductions.

MM-4.8-2 Electrify Buildings.

MM-4.8-3 Energy Conservation.

MM-4.8-4 Utilize 100% Zero-Carbon Electricity.

MM-4.8-5 Encourage Electric Vehicles.

MM-4.8-6 Water Use Efficiency and Water Conservation.

MM4.8-7 Solid Waste Reduction.

MM-4.8-8 Landscape Maintenance Equipment Emission Reduction.

MM-4.17-2 Transportation Demand Management (TDM) Program. (See Transportation header under Section 3.)

3.8 Hazards and Hazardous Materials

3.8.1 4.9b Significant Hazard from Reasonably Foreseeable Upset and Accident Conditions

Impact 4.9b Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.9-15 through 4.9-19.)

Facts in Support of Finding: Construction. During construction, heavy equipment and hazardous materials such as gasoline, diesel fuel, lubricants, paints, and solvents would be used. These materials would be stored in designated areas, and construction contractors must adhere to federal, state, and local regulations to ensure safe handling and disposal. The use of these materials is not expected to pose significant risks to the public or the environment, as contractors are required to implement safety protocols such as spill prevention measures and response procedures. Additionally, BMPs in compliance with the NPDES General Construction Permit would be followed to minimize risks due to accidental spills or contamination. The Project would also be subject to regulations regarding the safe storage and handling of hazardous materials, with all materials disposed of in accordance with legal requirements. The use of these materials would not result in large quantities that could cause significant environmental contamination.

The potential environmental hazards during construction also include the disturbance of soils containing legacy contaminants such as aerially deposited lead (ADL) from past vehicle emissions along nearby highways. While the Project site is unlikely to be directly impacted by high ADL concentrations, off-site improvements closer to I-5 may encounter contaminated soils. To mitigate this, a Soils Management Plan (SMP) would be implemented to identify and manage any ADL encountered. Additionally, Valley Fever spores, which can be present in soil and released during earthwork, could pose a health risk to construction workers on-site. Dust control measures and respiratory protection would minimize these risks. Potential legacy contaminants like polychlorinated biphenyls (PCBs), lead-based paint, or asbestos may also be encountered during construction and implementation of MM-4.9-1 and compliance with the NPDES General Construction Permit and BMPs would reduce impacts to less than significant with mitigation. (DEIR, pp. 4.9-15 through 4.9-19.)

Mitigation Measures:

MM-4.9-1 Soils Management Plan (SMP). Prior to issuance of a grading permit, the Applicant shall retain a Qualified Environmental Specialist to prepare a Soil Management Plan (SMP) for submittal to the Los Angeles County Fire Department Hazardous Materials Division for approval. The SMP shall provide the protocols for all earthwork activities and the potential to encounter previously unidentified hazardous materials or wastes on the Project site as well as within off-site disturbance areas. Potential conditions and/or hazards that may be encountered during construction activities include but may not limited to buried septic systems, buried debris (e.g., building debris with lead-based paint chips or asbestos), areas of soil staining, or other suspect conditions that can be

identified visually and/or from odors within the Project's proposed disturbance area. If suspect materials or conditions are encountered, then the following actions are required and specific protocols, consistent with applicable Health and Safety Code and Health Hazardous Materials Division of the Los Angeles County Fire Department (LACoFD) requirements, shall be included in the SMP: (1) earthwork activities in that area shall cease until sampling and characterization is completed by the Qualified Environmental Specialist; (2) depending on sampling/analysis results, the appropriate oversight agency shall be notified (e.g. Regional Water Quality Control Board, Department of Toxic Substances Control (DTSC), or the local Certified Unified Program Agency (LACoFD); (3) documentation shall be prepared that itemizes required sampling, results, and actions in conformance with regulatory standards to be taken; (4) protocols for resuming earthwork activities following approval from the oversight agency and remediation of contamination, if any, as deemed necessary by the Qualified Environmental Specialist and oversight agency; (5) National Institute for Occupational Safety and Health (NIOSH)-approved half-face respirators equipped with minimum N-95 protection factor shall be available upon request for use during worker collocation with surface disturbance activities; and (6) hand washing facilities and areas for changing of clothing shall be provided during worker collocation with surface disturbance activities.

The SMP shall outline requirements for construction activities that occur within 30 feet of the edge of Interstate 5 (I-5) to address potential aerially deposited lead (ADL) from historic vehicle emissions that included leaded fuels. The SMP shall set forth protocols for soil sampling beneath the pavement of The Old Road within 30-feet of I-5 to determine ADL concentrations and require that if soils are affected by ADL, they shall be managed consistent with all applicable DTSC standards and requirements.

The SMP shall outline requirements for ground-disturbing activities as part of the Project as it relates to the potential of releasing spores of Coccidioidomycosis (also known as Valley Fever) into the air. In addition to providing N-95 respiratory masks upon request for construction personnel during any ground-disturbance activities, the SMP shall require the provision of educational material to construction personnel. This educational material shall include information on how to minimize exposure to and recognize symptoms of Valley Fever and ways report symptoms of Valley Fever; proper cleaning procedures to minimize accidental exposure; and demonstrations on how to use personal protective equipment, such respiratory protection, skin, and eye protection.

The SMP shall require that any heavy equipment with factory enclosed cabs be provided with high-efficiency particulate absorbing filter (HEPA)-rated air filtration and positive pressure air. The General Contractor utilizing applicable heavy equipment shall provide proof of worker training on proper use of applicable heavy equipment cabs. Communication methods, such as two-way radios, shall be available for use in enclosed cabs.

3.8.2 4.9c Hazards within One-Quarter Mile of Sensitive Land Uses

Impact 4.9c Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?

Finding: Less Than Significant Impact with Mitigation (DEIR, p. 4.9-20.)

Facts in Support of Finding: Construction. Sensitive land uses within one-quarter mile of the Project site boundary includes residences and a daycare center. The Project site is 0.28-miles from the closest school, Wiley Canyon Elementary School. However, the Project would not include any activities or land uses during either construction or operation that could result in substantive emissions of acutely hazardous materials, substances or wastes.

The Project's construction activities could disturb soils with potential legacy contaminants such as ADL, lead-based paint, PCBs, asbestos, and Valley Fever, leading to hazardous emissions. Construction would adhere to SCAQMD rules, including those addressing nuisance and fugitive dust, to prevent hazardous emissions and ensure compliance. However, because there is the potential the Project could disturb soils containing these hazards compliance with MM-4.9-1, which requires a Soils Management Plan would be required to reduce impacts less than significant with mitigation. (DEIR, p. 4.9-20.)

Mitigation Measures:

MM-4.9-1 Soils Management Plan (SMP).

3.8.3 4.9d Hazardous Materials Sites

Impact 4.9d Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.9-21 through 4.9-22.)

Facts in Support of Finding: Construction/Operation. The Project site is not listed on hazardous materials databases per Government Code Section 65962.5. The nearest hazardous waste site, Valencia Oaks Ranch, is not a current generator of hazardous waste and has had no violations. However, a plugged subsurface oil well (Ayers 1) is located on the Project site and may pose a risk of methane gas emissions if disturbed, especially as residential units are planned within 300 feet. To address this, MM-4.9-2, Well Assessment, and MM-4.9-3, Methane Gas Survey and Remediation, would be required to reduce impacts to less than significant with mitigation. These measures require professional evaluation of the well's condition, methane surveys, and potential remediation or gas protection systems for habitable structures near the well, ensuring safety.

Additionally, a Phase I Environmental Site Assessment prepared for the Project assessed radon risks and found the site in a moderate-risk zone (Zone 2), but radon levels are below the Environmental Protection Agency action threshold and no subterranean living spaces are planned. Therefore, radon risks are not considered significant. (DEIR, pp. 4.9-21 through 4.9-22.)

Mitigation Measures:

MM-4.9-2 Well Assessment. Prior to issuance of a grading permit, the Applicant shall retain a California registered design professional, such as a licensed civil engineer and/or licensed petroleum engineer to evaluate the exact location, condition, and abandonment status of the well on the Project site. A summary report detailing the findings of the well conditions and abandonment status shall be submitted to the Los Angeles Department of Public Works (Public Works) Building Official and California Geologic Energy Management (CalGEM) for review and approval prior to issuance of a grading permit. Pursuant to Section 110.4 of the Los Angeles County Building Code (LACBC),

building permits shall not be issued for new buildings or enclosed structures, additions, or conversions of any building or structure to habitable or occupiable space on, adjacent to, or within 300 feet (91.44 meters) of the existing plugged well without documentation, stamped and signed by the licensed engineer, of proper abandonment of the existing well consistent with CalGEM guidelines and approval by the Public Works Building Official. A CalGEM monitor shall be present on site during all abandonment activities of the on-site oil well. Any further additional abandonment or removal of the plugged well as required by CalGEM shall be completed and approved by CalGEM prior to issuance of a grading permit.

MM-4.9-3 Methane Gas Survey and Remediation. Prior to issuance of a grading permit, the Applicant shall conduct methane gas testing for the presence of methane gas emissions within 300 feet of the plugged well, in accordance with CalGEM and Los Angeles County Department of Public Works (Public Works) methane gas assessment guidelines. The Project applicant shall retain a Qualified Geotechnical Specialist to perform the methane gas soil survey and provide a summary report of the findings with recommendations for remedial work, if necessary. The summary report shall be submitted to the Public Works Building Official for review and approval prior to issuance of a grading permit.

In the event that the soil gas investigation indicates methane levels that exceed 5,000 parts per million by volume, the Project Applicant shall include installation of a gas protection system for residences within 300 feet of the plugged oil well. The gas protection system shall be developed in compliance with the Public Works Methane Hazard Mitigation Policy and become part of the project design plans. The Applicant shall submit documentation to Public Works that ensures compliance with the proper abandonment standards and necessary approvals from CalGEM regarding the appropriate well abandonment. It shall ensure that this has been completed prior to commencement of construction of the Project and that all remedial and grading activity recommendations have been implemented to the satisfaction of CalGEM and the Public Works Building Official prior to commencement of construction grading.

3.8.4 4.9f Adopted Emergency Response or Evacuation Plan

Impact 4.9f Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.9-22 through 4.9-24.)

Facts in Support of Finding: Construction. The Project site is located near key regional and local access routes for emergency response, with I-5 providing the primary evacuation route about 150 feet east of the site. Local access is via The Old Road, which connects to I-5 and other nearby on- and off-ramps. Potential impacts on emergency evacuation could arise during construction activities, such as temporary lane closures on The Old Road, which might disrupt emergency access if not properly managed. However, implementation of a construction traffic management plan (MM-4.17-1) would ensure that emergency access is maintained during construction, with measures for traffic control, pedestrian access, and notification of disruptions, ensuring that construction-related impacts would be less than significant with mitigation.

Operation. Operationally, the Project would not disrupt regional or local evacuation routes. Emergency vehicle access would be provided via proposed on-site public streets and a private fire road, all designed in compliance with County Fire Code and emergency access requirements for residential development in a Very High Fire Hazard Severity Zone (VHFHSZ). The design includes multiple points of vehicular access, gates for emergency access, and adherence to fire safety regulations. Additionally, the Project would implement a Wildfire Education Program (MM-4.20-1) to inform residents about emergency egress routes. With implementation of MM-4.17-1 and MM-4.20-1, the Project would not impair emergency response or evacuation plans, and potential impacts will be less than significant with mitigation. (DEIR, pp. 4.9-22 through 4.9-24.)

Mitigation Measures:

MM-4.17-1 Construction Traffic Management Plan. (See Transportation header under Section 3.)

MM-4.20-1 Wildfire Education Program. (See Wildfire header under Section 3.)

3.8.5 4.9g Wildland Fires

Impact 4.9g Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires because the project is located (i) within a high fire hazard area with inadequate access; (ii) within an area with inadequate water and pressure to meet fire flow standards; or (iii) within proximity to land uses that have the potential for dangerous fire hazard?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.9-24 through 4.9-27.)

Facts in Support of Finding: Construction. The Project site is located in Fire Zone 4, a VHFHSZ with recent fires occurring in 2016, 2020, 2021, and 2025. During construction, there could be temporary road closures and inadequate access, potentially hindering emergency response and increasing fire risks. To mitigate these impacts, the Project would implement a Construction Fire Prevention Plan (MM-4.20-4), fire prevention measures (MM-4.20-5), and a Construction Traffic Management Plan (MM-4.17-1) to ensure emergency access and safety. Additionally, during construction, the Project could face substantial fire risks due to inadequate water supply and pressure to meet fire flow standards. This could potentially affect people or structures on-site. To mitigate this, the Project would implement MM-4.20-4, Construction Fire Prevention Plan, to train personnel and provide fire-suppression equipment, as well as ensure access to water supplies and water trucks. Additionally, MM-4.20-5, Construction Related Fire Prevention Measures, would require fuel modification before construction begins and the installation of operable fire hydrants and temporary fire-suppression systems before any combustible materials are brought on-site. With MM-4.17-1, MM-4.20-4, and MM-4.20-5, construction-related fire risks would be reduced to less than significant with mitigation.

Operation. The Project would provide adequate emergency access through designed roads and private fire roads meeting County Fire Code standards. However, due to the site's location in a high fire hazard area, there is a potential risk to people or structures during operations. To address this, the Project would implement a Wildfire Education Program (MM-4.20-1) to inform residents of evacuation procedures and fire safety measures. Additionally, the Project would incorporate infrastructure such as a new water tank to ensure reliable fire flow and fire hydrants to meet the LACoFD standards. Fire sprinkler systems would be required in all habitable structures, and the water tank would meet preliminary fire flow requirements to guarantee sufficient pressure for fire

suppression. The Project would also comply with the CBC and LACoFD regulations, including a comprehensive fuel modification plan and other fire safety measures. Implementation of MM-4.20-1 and existing requirements, along with ongoing inspections, would ensure that the Project's proximity to wildfire-prone areas does not result in significant fire hazards, and all operational impacts would be less than significant with mitigation. (DEIR, pp. 4.9-24 through 4.9-27.)

Mitigation Measures:

MM-4.17-1 Construction Traffic Management Plan. (See Transportation header under Section 3.)

MM-4.20-1 Wildfire Education Program. (See Wildfire header under Section 3.)

MM-4.20-4 Construction Fire Prevention Plan. (See Wildfire header under Section 3.)

MM-4.20-5 Construction-Related Fire Prevention Measures. (See Wildfire header under Section 3.)

3.8.6 4.9h Fire Hazards

Impact 4.9h Does the proposed use constitute a potentially dangerous fire hazard?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.9-27 through 4.9-29.)

Facts in Support of Finding: Construction/Operation. The Project would introduce new residences that could increase the potential for fire-related incidents during construction and operation. Therefore, implementation of the Project could result in a potentially significant impact regarding a potentially dangerous fire hazard. The Project would be required to comply with multi-tiered fire protection measures designed to prevent ignition and reduce fire hazards, such as adherence to the California Fire Code and County Fire Code, construction utilizing fire-ignition resistant building materials for home hardening, inclusion of defensible space, and the preparation of a comprehensive fuel modification plan, including brush clearance/thinning. The Project would also implement a Wildfire Evacuation Plan, a Construction Fire Prevention Plan (MM-4.20-4), and other related fire safety measures like the installation of fire hydrants, management of landscaping to reduce fuel, and construction-related fire prevention measures (MM-4.20-5). These strategies, along with required annual fuel modification maintenance, ensure that the Project minimizes fire risks during both construction and operation, reducing potential impacts to less than significant with mitigation.

The Project's design further reduces fire risks by clustering development within a smaller footprint, concentrating residential and recreational areas in the northeastern portion of the site, leaving the majority of the land as preserved open space. This approach aligns with County policies aimed at minimizing wildfire risks through density-controlled development. The Project's fuel modification plan, which includes fire-resistant planting, defensible space, and long-term maintenance, would also help mitigate fire hazards. In addition, the Project must comply with County regulations for fire safety, including the establishment of fire access roads, setbacks, and fire protection infrastructure. Additionally, as detailed in Section 4.20, Wildfire, with implementation of MM-4.20-1, Wildfire Education Program, MM-4.20-2, Alternative Materials and Methods, MM-4.20-3, Annual Fuel Modification Zone Inspection, MM-4.20- 4, Construction Fire Prevention Plan, and MM-4.20-5, Construction Related Fire Prevention Measures, the Project would further reduce fire risks at the Project site. For example, MM-4.20-4, Construction Fire Prevention Plan would require implementation of an educational program for future residents at the site. Therefore, even though the introduction of the Project's land uses into the wildland areas would bring

opportunities for man-made activities to pose a potentially dangerous fire hazard due to the surrounding open spaces within a VHFHSZ, the adherence to fire suppression and fire safety requirements and implementation of MM-4.20-1 through MM-4.20-5 would reduce potential construction and operational impacts from a potentially dangerous fire hazard to a less than significant level. (DEIR, pp. 4.9-27 through 4.9-29.)

Mitigation Measures:

MM-4.20-1 Wildfire Education Program. (See Wildfire header under Section 3.)

MM-4-20-2 Alternative Materials and Methods. (See Wildfire header under Section 3.)

MM-4.20-3 Annual Fuel Modification Zone Inspection. (See Wildfire header under Section 3.)

MM-4.20-4 Construction Fire Prevention Plan. (See Wildfire header under Section 3.)

MM-4.20-5 Construction-Related Fire Prevention Measures. (See Wildfire header under Section 3.)

3.8.7 Cumulative Impacts – Hazards and Hazardous Materials

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.9-29 through 4.9-33.)

Facts in Support of Finding: The Project would have less than significant impacts for all hazards and hazardous materials thresholds, with mitigation. In general, hazardous materials sites are handled on a project-by-project basis and generally do not contribute to a cumulative significant impact related to hazardous materials sites. The Project and cumulative projects would be required to adhere to the comprehensive set of existing federal, State, and local regulatory requirements, including the Hazardous Materials Business Plan programs and SCAQMD's Rule 402 and 403, and applicable City of Santa Clarita regulations, for project located within the City's jurisdiction. These programs require all users of hazardous materials to implement employee training, safe storage, and appropriate handling requirements to ensure that upset and accident conditions are minimized. The routine use, transport, and disposal of hazardous materials are site-specific and regulated, preventing significant combined effects. Nearby projects are primarily residential, involving minimal hazardous material usage and complying with safety protocols to minimize risks, including those from accidental releases. The cumulative projects are primarily residential projects that are not anticipated to result in substantive hazardous emissions or handle acutely hazardous substances. All cumulative construction activities would be subject to SCAQMD rules, including Rule 402, Nuisance, which prohibits the discharge from any source of air contaminants or other materials which could cause injury, determent, nuisance, or annoyance that may endanger the comfort, health, or safety of the public. Operationally, none of the cumulative projects would include the manufacturing or industrial-scale emissions or handling of any hazardous or acutely hazardous materials, substances or waste and all would be subject to the same regulatory requirements as the proposed Project. Regarding emergency evacuation plans and fire hazards, all cumulative projects are subject to the fire codes and regulations to determine potential risk for wildland fires. With implementation of MM-4.9-1 through MM-4.9-3, MM-4.17-1, and MM-4.20-1 through MM-4.20-4, the Project would not result in cumulatively considerable impacts associated with hazards or hazardous materials with mitigation. (DEIR, pp. 4.9-29 through 4.9-33.)

Mitigation Measures:

MM-4.9-1 Soils Management Plan (SMP).

MM-4.9-2 Well Assessment.

MM-4.9-3 Methane Gas Survey and Remediation.

MM-4.17-1 Construction Traffic Management Plan. (See Transportation header under Section 3.)

MM-4.20-1 Wildfire Education Program. (See Wildfire header under Section 3.)

MM-4-20-2 Alternative Materials and Methods. (See Wildfire header under Section 3.)

MM-4.20-3 Annual Fuel Modification Zone Inspection. (See Wildfire header under Section 3.)

MM-4.20-4 Construction Fire Prevention Plan. (See Wildfire header under Section 3.)

3.9 Hydrology and Water Quality

3.9.1 4.10a Water Quality Standards

Impact 4.10a Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.10-21 through 4.10-24.)

Facts in Support of Finding: Construction. The Project would have the potential to violate water quality standards or waste discharge requirements during construction activities. Compliance with California Health and Safety Code, Division 20, Chapter 6.95 requires that contractors would be required to prepare and implement a Hazardous Management Business Plan that require hazardous materials be properly used and stored in appropriate containers, that spill prevention measures are implemented, and spill response procedures are in place to respond to accidental releases. The California Fire Code would also require measures for the safe storage and handling of hazardous materials. Construction activities must be conducted in compliance with SCAQMD Rule 403 – Fugitive Dust, which would minimize wind and water erosion at the site. Compliance with the State Water Resources Control Board regulations requires preparation and implementation of a SWPPP, in accordance with the NPDES Construction General Permit. However, with implementation of MM-4.4-14, Jurisdictional Waters Compensation, construction impacts regarding a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means would be reduced to less than significant with mitigation.

Operation. The Project includes conversion of an undeveloped site with new residential, recreational, and associated roadway and utility infrastructure. The primary sources of pollution would be in runoff from these land uses which are expected to include oil, grease, petroleum products, and automobile-related pollutants, pathogens/bacteria from pets, pesticides/herbicides/insecticides and nitrogen and phosphorous from fertilizers for landscaping, and trash, lawn clippings, and debris that can accumulate impervious surfaces, such as parking lots, driveways, and sidewalks.

These anticipated pollutants would be addressed through Project features as well as through compliance with regulatory requirements. During operations, the Project site would consist of vegetated open space, landscaped areas, buildings, and hardscapes. During storm events, all stormwater flows from outside of the Project's developed

footprint would be directed into two larger, regional debris basins, as well as five smaller desilting basins). These basins would allow for settlement of debris and would then pass clear flows into the on-site storm drainage system to the outfall in the existing RBC culvert at The Old Road. All stormwater flows from on-site areas within the Project's developed footprint would be treated through proprietary biofiltration systems that would be placed throughout the development to treat stormwater flows, and then convey the flows into the on-site storm drainage system to the outfall in the existing RBC culvert at The Old Road, and finally to Wiley Canyon Creek and the South Fork of the Santa Clara River. In addition, with implementation of MM-4.4-14, there would be less than significant operational impacts regarding a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means. The Project's water quality BMPs, compliance with applicable laws and regulations and implementation of MM-4.4-14 would ensure that operation of the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, and impacts would be less than significant with mitigation. (DEIR, pp. 4.10-21 through 4.10-24.)

Mitigation Measures:

MM-4.4-14 Jurisdictional Waters Compensation. (See Biological Resources header under Section 3.)

3.10 Land Use and Planning

3.10.1 4.11b Conflict with Plans

Impact 4.11b Would the project cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.11-14 through 4.11-68.)

Facts in Support of Finding: The County land use plans applicable to the Project and adopted for the purpose of avoiding or mitigating an environmental effect include the General Plan and the OVOV, which is implemented under the General Plan. The Project would not conflict with applicable OVOV policies. Overall, with implementation of mitigation measures from applicable DEIR Sections and topics, Project impacts due to a conflict with the OVOV adopted for the purpose of avoiding or mitigated an environmental effect would be less than significant with mitigation. In addition, applicable County regulations adopted for the purpose of avoiding or mitigating an environmental effect include the standards codified within Chapters 22.102 (SEAs), 22.104 (HMAs), 22.172 (Oak Tree Permits); and 22.140.170 (Density-Controlled Developments) of the Zoning Code. With implementation of mitigation measures MM-4.3-1, MM-4.4-1 through MM-4.4-16, MM-4.5-1, MM-4.5-2, MM-4.7-1, MM-4.7-2, MM-4.8-1 through MM-4.8-8, MM-4.13-1 through MM-4.13-4, MM-4.17-1, MM-4.17-2, and MM-4.20-1 through MM-4.20-5, Project impacts due to a potential conflict with the General Plan and the OVOV adopted for the purpose of avoiding or mitigated an environmental effect would be less than significant with mitigation.

Chapter 22.102, SEAs. County Code Chapter 22.102, SEAs, outlines the requirements for the preservation of natural open space. The proposed Project would preserve 61.9% of the property as natural open space (i.e., 233.49-acre Project site with a minimum of 144.43 acres of open space placed under conservation easement). As required by MM-4.4-9, the Project's proposed off-site conservation area further preserves an additional 466.70 acres of natural open space adjacent to existing publicly owned lands within the same SEA as the Project. When considering

the Project site (233.49 acres) and off-site conservation area (466.70 acres), totaling 700.19 acres, the Project would preserve 611.13 acres (including 144.43 acres of on-site Conservation Area and 466.70 acres of off-site Conservation Area), which would result in the preservation in perpetuity of 87.3% of natural open space on the combined properties. This would exceed the requirements of the County's requirement for the preservation of 75% of the original undivided parcels as natural open space.

Of the 664 SEA-protected trees, 312 ordinance-sized trees and 22 heritage-sized trees would be impacted by the Project (Appendix C). At a minimum and per County requirements, the removal of any SEA Protected Tree is an impact and would require mitigation in the form of two replacement plantings for each tree removed (2:1 ratio) for non-heritage trees, while the removal of a heritage tree would require mitigation in the form of 10 replacement plantings for each heritage tree removed (10:1 ratio). The County may require a minimum of 772 mitigation trees to be planted in an area of the Project site where there is suitable habitat and where the trees will be able to remain in perpetuity (Appendix C). With the inclusion of mitigation measures (MM-4.4-1, On-Site Habitat Preservation; MM-4.4-2, Habitat Mitigation and Monitoring Plan; MM-4.4-6, Invasive Species Prevention; MM-4.4-9, Off-Site Habitat Preservation; and MM-4.4-16, SEA Protected Trees Replacement/Compensation), the Project would have a less than significant impact related to potential conflicts with any local policies or ordinances protecting biological and SEA resources (L.A. County Code, Title 22, Ch. 102) with mitigation. The Project is consistent with the SEA Ordinance as modified based on biological recommendations from Significant Ecological Areas Technical Advisory Committee (SEATAC), and adequacy of the Biota Report (Appendix C).

Chapter 22.104, HMAs. The County's Hillside Design Guidelines are intended to implement the General Plan policies to preserve significant natural features in hillside areas. The Hillside Design Guidelines also help to ensure that hillside development projects are designed in a manner that allows projects to meet the findings of the HMA ordinance (i.e., Chapter 22.104 of the Zoning Code). According to the Hillside Design Guidelines, for substantial compliance with the HMA ordinance, projects must use the design measures contained in the Guidelines that reasonably can be implemented in the projects' design (County of Los Angeles 2019b). The following examples are provided to demonstrate compliance with the Hillside Design Guidelines. For example, a slope analysis of the Project site was utilized to guide placement of residential development areas in locations that serve to minimize impacts to steep slopes and reduce impacts to hillside terrain while providing for a viable housing development. As such, development would be located on the flattest portion of the Project site (Design Measure 1.2). Another example is that the Project would comply with Design Measure 1.16, to provide private (connector) trails or pedestrian paseos that link together all of the Project's open space areas (one acre or larger) and connect to any on-site or off-site public trails. The Project's existing on-site non-dedicated trails would be conserved within the southern portion of the Project site, and the Project would connect to off-site public trails, including a connection to the Taylor Trail Wilderness and Open Space Area and a connection to Rivendale Park and Open Space and Ed Davis Park at Towsley Canyon. Furthermore, all roadways are designed to follow existing natural slope contours (Design Measure 3.2) and all building exteriors are designed to include stonework and/or woodwork that matches nearby rock and tree varieties (Design Measure 4.8). Finally, the Project includes native and drought-tolerant trees, shrubs, and ground cover over all exposed graded areas (Design Measure 5.5). As such, the Project complies with the HMA ordinance.

Chapter 22.172, Oak Tree Permits. The intent of Chapter 22.174.010, Oak Tree Permits, of the Zoning Code is to preserve the long-term health of all protected oak trees. The Project site supports 612 oak trees, including 51 heritage-sized oak trees (Appendix C). Project construction would follow standard avoidance and protective measures consistent with the purpose as outlined in Chapter 22.174.010 of the Zoning Code. The Project would preserve oak trees and associated vegetation in large portions of the Project site through preserving open space areas in the southerly and westerly portions of the site. Although oak trees are proposed for removal, removal of

oak trees is not contrary to the intent and purpose of the Oak Tree Permit procedure because the majority of the remaining oak trees would be preserved in dedicated in open space areas. At a minimum, the removal of any non-heritage oak tree will require mitigation in the form of two replacement trees for each tree removed and ten replacement trees for each heritage oak tree removed. Implementation of MM-4.4-1, On-site Habitat Preservation, would conserve approximately 144 acres of open space within a conservation easement and includes preservation of approximately 10.28 acres of oak woodland. In addition, MM-4.4-2, Habitat Mitigation and Monitoring Plan is required, which shall detail the specific approach for each type of habitat restoration and establishment area, special-status species transplant location, and SEA protected tree transplant/planting. With implementation of the Project, at least 772 native/mitigation trees would be planted. Additionally, MM-4.4-16, SEA Protected Trees Replacement/Compensation, addresses SEA guideline-recommended preservation making the Project compatible with SEA resources and reduces proposed impacts to less than significant. This details requirements of oak tree planting on and off the Project site. As such, the Project would not conflict with Chapter 22.174, Oak Tree Permits, of the Zoning Code. Impacts would be less than significant with mitigation.

Chapter 22.140.170, Density-Controlled Development. Consistent with OVOV's direction to avoid developing on open hillsides and other sensitive areas, the Project Applicant is requesting approval of a Density-Controlled Development CUP to allow the Project's attached and detached dwelling units, very low-income senior housing units, community recreation center, and all Project infrastructure to be clustered on the northeast portion of the Project site positioned proximate to the Project frontage on The Old Road. Through the Density-Controlled Development CUP, the Applicant will be able to designate approximately 175 acres of the 233-acre Project site as preserved and improved open space. This also allows the Applicant to provide for an on-site trail system.

Consistent with Density-Controlled Development CUP requirements (22.140.170, et seq. of the Zoning Code), the Project proposes to cluster residential development on approximately 41 acres of the 233-acre Project site. In total, the Project's on-site impact area, including the Project development footprint, fuel modification zones, and debris extents, would be approximately 83 acres in the northeastern portion of the Project site, thereby allowing for preservation of the majority of the site as open space. As required by Section 22.102.090, SEA Development Standards, of the County Code, approximately 144 acres of preserved open space would be designated as permanent open space within a conservation easement (through implementation of MM-4.4-1) and will comply with density-controlled development requirements. Clustering Project development via the requested density-controlled development CUP will enable the Project to meet density controlled development and OVOV goals by:

- Reducing the total amount of grading required on the Project site because the grading limits proposed are significantly pulled back from the grading limits authorized under existing entitlement approvals for the Project.
- Preserving oak trees and other native vegetation through preservation of large open space areas in the southerly and westerly portions of the Project site.
- Preserving the existing ridgeline located in the southeast portion of the Project site in its natural state.
- Preserving open space through the designation of approximately 175 acres of preserved open space and improved open space. Without clustering, construction of the same number of units would require substantially greater area and would significantly reduce land area available for open space.
- Creating substantial recreational areas available to the public. The Project provides approximately 1 mile of trails across the Project site. In addition, the Project would include substantial amenities maintained by the Homeowners' Association for residents of the Project, including a community recreation center.

As demonstrated, the Project would comply with the requirements of Chapter 22.140.170, Density-Controlled Development of the Zoning Code.

Mitigation Measures:

MM-4.3-1 Construction Equipment. (See Air Quality header under Section 3.)

MM-4.4-1 On-Site Habitat Preservation. (See Biological Resources header under Section 3.)

MM-4.4-2 Habitat Mitigation and Monitoring Plan. (See Biological Resources header under Section 3.)

MM-4.4-3 Special-Status Plants Seed and Bulb Survey, Salvage, and Translocation. (See Biological Resources header under Section 3.)

MM-4.4-4 Biological Monitoring. (See Biological Resources header under Section 3.)

MM-4.4-5 Demarcation of Disturbance Limits. (See Biological Resources header under Section 3.)

MM-4.4-6 Invasive Species Prevention. (See Biological Resources header under Section 3.)

MM-4.4-7 Landscaping Plan. (See Biological Resources header under Section 3.)

MM-4.4-8 Crotch's Bumble Bee Habitat Preservation and Minimization Measures. (See Biological Resources header under Section 3.)

MM-4.4-9 Off-Site Habitat Preservation. (See Biological Resources header under Section 3.)

MM-4.4-10 Special-Status Wildlife Relocation Plan. (See Biological Resources header under Section 3.)

MM-4.4-11 Nesting Bird Avoidance. (See Biological Resources header under Section 3.)

MM-4.4-12 Lighting Plan. (See Biological Resources header under Section 3.)

MM-4.4-13 Homeowners' Association Covenants, Conditions, and Restrictions. (See Biological Resources header under Section 3.)

MM-4.4-14 Jurisdictional Waters Compensation. (See Biological Resources header under Section 3.)

MM-4.4-15 Roosting Bat Survey. (See Biological Resources header under Section 3.)

MM-4.4-16 SEA Protected Trees Replacement/Compensation. (See Biological Resources header under Section 3.)

MM-4.5-1 Archaeological Monitoring. (See Cultural Resources header under Section 3.)

MM-4.5-2 Workers Environmental Awareness Program (WEAP) Training. (See Cultural Resources header under Section 3.)

MM-4.7-1 Workers Environmental Awareness Program (WEAP) Training. (See Geology and Soils header under Section 3.)

MM-4.7-2 Paleontological Monitoring. (See Geology and Soils header under Section 3.)

MM-4.8-1 Construction Emission Reductions. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.8-2 Electrify Buildings. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.8-3 Energy Conservation. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.8-4 Utilize 100% Zero-Carbon Electricity. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.8-5 Encourage Electric Vehicles. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.8-6 Water Use Efficiency and Water Conservation. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.8-7 Solid Waste Reduction. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.8-8 Landscape Maintenance Equipment Emission Reduction. (See Greenhouse Gas Emissions header under Section 3.)

MM-4.13-1 Simultaneous Equipment Operation Limit for Portion of Lot 22. (See Noise header under Section 3.)

MM-4.13-2 Staging Areas & Stationary Equipment. (See Noise header under Section 3.)

MM-4.13-3 Stationary Equipment Construction Noise Barrier. (See Noise header under Section 3.)

MM-4.13-4 Temporary Noise Barrier for On-Site Phases. (See Noise header under Section 3.)

MM-4.17-1 Construction Traffic Management Plan. (See Transportation header under Section 3.)

MM-4.17-2 Traffic Demand Management (TDM) Plan. (See Transportation header under Section 3.)

MM-4.20-1 Wildfire Education Program. (See Wildfire header under Section 3.)

MM-4.20-2 Alternative Materials and Methods. (See Wildfire header under Section 3.)

MM-4.20-3 Annual Fuel Modification Zone Inspection. (See Wildfire header under Section 3.)

MM-4.20-4 Construction Fire Prevention Plan. (See Wildfire header under Section 3.)

MM-4.20-5 Construction-Related Fire Prevention Measures. (See Wildfire header under Section 3.)

3.10.2 4.11c Hillside Management Areas or Significant Ecological Areas

Impact 4.11c Would the project conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.11-67 through 4.11-68.)

Facts in Support of Finding: The Project site is located within a County-designated HMA and the Santa Susana Mountains/Simi Hills SEA. Overall, the Project proposes to cluster development, including a diverse mix of residential types on 41.47 gross acres of the site. In total, the Project's on-site impact area would be approximately 83 acres in the northeastern portion of the Project site, thereby allowing for preservation of the majority of the site as open space. This would reduce the number of HMA slopes and SEA Protected Trees that would be impacted. Clustering also results in the development area to be largely contained in the lower-lying or flatter areas of the site, with most of the development situated within the 0 to 24.99% slope range. This design approach also reduces the overall grading quantities that may have otherwise been generated by a more expansive design.

The Project would be required to comply with Chapter 22.102 of the Zoning Code, including a discretionary SEA CUP approval for impacts exceeding ministerial review thresholds. Mitigation measures (MM-4.4-1 through MM-4.4-16) would reduce impacts on SEAs, federally and state-listed species, and SEA-protected trees to less than significant levels. Additionally, the Project avoids a significant on-site ridgeline and situates development on flatter terrain. Therefore, the Project would not cause a significant environmental impact due to a conflict with the goals and policies of the General Plan related to HMAs or SEAs, and impacts would be less than significant with mitigation. (DEIR, pp. 4.11-67 through 4.11-68.)

Mitigation Measures:

MM-4.4-1 On-Site Habitat Preservation. (See Biological Resources header under Section 3.)

MM-4.4-2 Habitat Mitigation and Monitoring Plan. (See Biological Resources header under Section 3.)

MM-4.4-3 Special-Status Plants Seed and Bulb Survey, Salvage, and Translocation. (See Biological Resources header under Section 3.)

MM-4.4-4 Biological Monitoring. (See Biological Resources header under Section 3.)

MM-4.4-5 Demarcation of Disturbance Limits. (See Biological Resources header under Section 3.)

MM-4.4-6 Invasive Species Prevention. (See Biological Resources header under Section 3.)

MM-4.4-7 Landscaping Plan. (See Biological Resources header under Section 3.)

MM-4.4-8 Crotch's Bumble Bee Habitat Preservation and Minimization Measures. (See Biological Resources header under Section 3.)

MM-4.4-9 Off-Site Habitat Preservation. (See Biological Resources header under Section 3.)

MM-4.4-10 Special-Status Wildlife Relocation Plan. (See Biological Resources header under Section 3.)

MM-4.4-11 Nesting Bird Avoidance. (See Biological Resources header under Section 3.)

MM-4.4-12 Lighting Plan. (See Biological Resources header under Section 3.)

MM-4.4-13 Homeowners' Association Covenants, Conditions, and Restrictions. (See Biological Resources header under Section 3.)

MM-4.4-14 Jurisdictional Waters Compensation. (See Biological Resources header under Section 3.)

MM-4.4-15 Roosting Bat Survey. (See Biological Resources header under Section 3.)

MM-4.4-16 SEA Protected Trees Replacement/Compensation. (See Biological Resources header under Section 3.)

3.11 Noise

3.11.1 4.13a Substantial Temporary or Permanent Increase in Ambient Noise Levels

Impact 4.13a Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.13-17 through 4.13-25.)

Facts in Support of Finding: Construction. Operation of construction equipment would have the potential to exceed applicable noise limits at neighboring residential properties to the north during construction activities, specifically on Lot 22. Mitigation measures are required to reduce construction noise impacts to less than significant. MM-4.13-1, Simultaneous Equipment Operation Limit for Portion of Lot 22, would restrict the use of more than one piece of equipment within the portion of Lot 22 designated on Figure 4.13-3 (DEIR, p. 4.13-41), Area of Lot 22 in which Construction Noise Mitigation is Required. MM-4.13-2, Staging Areas and Stationary Equipment, shall require that stationary construction equipment not be located on Lot 22, and requires other best practices for reducing construction noise. With implementation of MM-4.13-1, and MM-4.13-2, noise levels nearest the existing off-site residences to Lot 22 and the northern end of The Old Road Improvements would not exceed the 75 dBA equivalent noise level over a given period (L_{eq}) noise limit for mobile construction equipment, and as such, construction noise impacts from mobile construction equipment would be less than significant with mitigation. To reduce noise levels below the County's mobile equipment thresholds for occupied units while construction is still ongoing, implementation of MM-4.13-4, Temporary Noise Barrier for On-site Phases, is required. Per MM-4.13-4, for mobile equipment, a temporary noise barrier shall be erected along the boundary between each Project Lot under active construction and immediately adjacent Project Lots with occupied residences. To reduce noise levels associated with stationary construction equipment below the County's stationary equipment thresholds, a surrounding barrier or enclosure shall be constructed between the stationary equipment and adjacent Lots with occupied residences. This would ensure impacts to occupied units would be reduced to less than significant with mitigation.

Noise levels from stationary construction equipment would exceed the 60-dBA L_{eq} noise limit at the construction site boundary at Lots 2, 3, 8, 9, 10, 11, and 22, and within the northern end of The Old Road Improvements construction zone, and impacts would be potentially significant. However, implementation of MM-4.13-1, MM-4.13-2 and MM-4.13-3 would reduce noise levels from stationary construction equipment to below the 60-dBA-L_{eq} construction noise limit for stationary noise sources and impacts would be less than significant with mitigation. (DEIR, pp. 4.13-17 through 4.13-25.)

Mitigation Measures:

MM-4.13-1 Simultaneous Equipment Operation Limit for Portion of Lot 22. Within the area of Lot 22 designated on Figure 4.13-3, Area of Lot 22 In Which Construction Noise Mitigation is Required of the Draft Environmental Impact Report (EIR), the total quantity of mobile construction equipment allowed to operate simultaneously shall not exceed one.

MM-4.13-2 Staging Areas & Stationary Equipment. Prior to issuance of grading permits, the County/Project applicant shall incorporate the following measures as a note on the grading plan cover sheet to ensure that the greatest distance between noise sources and sensitive receptors during construction activities have been achieved.

- Neither stationary construction equipment (i.e., generator, air compressor, cement mixer) nor construction staging areas shall be located within Lot 22.
- Construction equipment, fixed or mobile, shall be equipped with properly operating and maintained noise mufflers consistent with manufacturers' standards.
- Construction staging areas shall be located away from off-site sensitive uses during Project construction.
- The Project contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the Project site, whenever feasible.

MM-4.13-3 Stationary Equipment Construction Noise Barrier. Stationary construction equipment located within 600 feet of the northern Project site property boundary in Lots 2, 3, 8, 9, 10, and 11 and within The Old Road Improvements construction zone shall each be enclosed within a sound barrier of 10-foot minimum height.

MM-4.13-4 Temporary Noise Barrier for On-Site Phases. For mobile equipment (as defined by the Section 12.08.440 of the Los Angeles County Code) construction activities within a Project Lot that is adjacent to an occupied, on-site residence, a temporary noise barrier shall be erected and maintained along the boundary between the Project Lot under construction and the Project Lot with occupied residence(s). The noise barrier for mobile construction equipment operation shall either: (1) extend along the entire common boundary between the construction zone and adjacent occupied Project Lot; or (2) extend from either end of the construction zone a length that is twice the separation distance between the construction zone and closest residence. For stationary construction equipment (as defined by the Section 12.08.440 of the Los Angeles County Code), temporary sound barriers surrounding three sides of the equipment (with the remaining open side facing the opposite direction from the adjacent occupied residences) shall be erected and maintained.

The temporary sound barriers shall remain in place throughout the duration of the applicable construction activity. To determine the appropriate height and length of the temporary noise barrier, prior to construction activities for each phase of development, the construction contractor shall determine the nearest occupied residence to the phased construction activity and abide by the below requirements:

Distance from Construction to On-site, Occupied Residence	Type of Equipment	Noise Barrier Height	Location for Barrier
50 to 99 feet	Mobile	14 feet	Along boundary between construction zone and adjacent Lot.
50 to 99 feet	Stationary	11 feet	Within 5 feet of stationary equipment, 3 sides
100 to 250 feet	Mobile	12 feet	Along boundary between construction zone and adjacent Lot.
100 to 300 feet	Stationary	11 feet	Within 5 feet of stationary equipment, 3 sides
Beyond 250 feet	Mobile	None	None
Beyond 300 feet	Stationary	None	None

3.11.2 Cumulative Impacts – Noise

Finding: Less Than Significant Impact (DEIR, pp. 4.13-31 through 4.13-33.)

Facts in Support of Finding:

Construction. Existing residences are located as close as 110 feet from the Project site boundary, but these residences would be located at approximately 2,000 feet (from Cumulative Project LA2) and 5,000 feet (from Cumulative Project LA1) as measured from the approximate project boundaries to the Project site. At these distances, the construction noise contribution from Cumulative Project LA1 at the residence closest to the Project site would be reduced to approximately 32 dBA L_{eq} while contributions from Project LA2 would be reduced to approximately 40 dBA (Appendix H of the DEIR). Adding together 32 dBA, 40 dBA, and 60 dBA yields a sum of effectively 60 dBA. Therefore, even if Cumulative Projects LA1 and LA2 were constructed at the same time as the Project, the Project would not contribute to a cumulatively considerable impact regarding substantial temporary increase in ambient noise levels in the vicinity of the Project.

Cumulative Project SC1 is in the City of Santa Clarita and would be held to the construction noise limit of 80 dBA L_{eq} during construction activities, which would be applied at the closest residences to Cumulative Project SC1, which are approximately 400 feet to the north of Cumulative Project SC1 and approximately 440 feet east of the Project site. A continuous retaining wall between the north and south lanes of I-5, and existing commercial buildings along the west side of I-5/The Old Road would be expected to reduce these sound levels to no more than 57 dBA at the closest residence to the Project site. Adding 57 dBA and 60 dBA together, the sum would be 61 (a one dBA increase), which would not be discernable to the human ear. There is a possibility that Cumulative Projects LA1,

LA2, and SC1 and the Project would not be constructed simultaneously, and therefore, examination of noise exposure from the closest construction project to that resident represents a reasonable analysis of construction noise exposure on a cumulative basis. The Project would not contribute to a cumulatively considerable impact regarding substantial temporary increase in ambient noise levels in the vicinity of the Project with respect to Cumulative Projects LA1, LA2, and SC1. Regarding traffic noise, roadway segment increases from current conditions to the Future Base 2029 Plus Project would in all cases be well below the significance level of a 3 decibel increase. Consequently, the Project would not contribute to a cumulatively significant traffic noise impact, with mitigation.

Mitigation Measures:

MM-4.13-1 Simultaneous Equipment Operation Limit for Portion of Lot 22.

MM-4.13-2 Staging Areas & Stationary Equipment.

MM-4.13-3 Stationary Equipment Construction Noise Barrier.

MM-4.13-4 Temporary Noise Barrier for On-Site Phases.

3.12 Public Services

3.12.1 4.15a(i)(ii)(iii)(iv)(vi) Fire Protection, Sherriff Protection, Schools, Parks, and Other Public Facilities

Impact 4.15a(i)(ii)(iii)(iv)(vi) Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection; sheriff protection; schools; parks; and other public facilities?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.15-29 through 4.15-44.)

Facts in Support of Finding:

Fire Protection. Construction. During construction, the Project could temporarily increase fire risk through activities such as welding or handling combustible materials. Compliance with fire safety regulations (Cal/OSHA Title 29, Part 1926 of CFR and Title 8, Subchapter 4 of CCR) and implementation of MM-4.20-4 and MM-4.20-5 would reduce potential wildfire hazards, including on-site fuel modification to achieve the necessary defensible space. Short-term traffic or utility work on The Old Road and Calgrove Road could affect emergency vehicle access, but MM-4.17-1 would ensure that construction activities do not inhibit emergency response. Implementation of MM-4.20-4, MM-4.20-5, and MM-4.17-1 would reduce construction-related impacts to less than significant with mitigation.

Operation. During operation, the addition of 510 residential units would increase demands on the LACoFD, but LACoFD has indicated that existing stations (notably Fire Station 124) can serve the demands of the Project without needing to construct a new facility. Ongoing compliance with building codes (e.g., CBC Chapter 7A) and payment of the County's Fire Facility Fee would maintain service ratios and response times, while MM-4.20-1, MM-4.20-2, and

MM-4.20-3 further reduce on-site ignition risk. Consequently, fire protection impacts would be less than significant with mitigation.

Sheriff Protection. Construction. During construction, the Los Angeles County Sheriff's Department (LASD) would be responsible for addressing minor security issues (e.g., theft or trespassing), but any related increase in service demand is during construction is expected to be minor. Fencing along the site perimeter (via implementation of MM-4.1-1) would reduce opportunities for criminal activities, while adherence to MM-4.17-1 (requiring preparation and implementation of a Construction Traffic Management Plan) would minimize disruption to traffic flows and ensure emergency vehicle access remains unobstructed.

Schools. Construction. Construction workers are typically mobile and would not substantially increase local school enrollments. During operation, the Project would generate new students attending schools in the Newhall School District (Pico Canyon Elementary) and the William S. Hart Union High School District (Rancho Pico Junior High and West Rancho High). MM-4.17-1 would require that a Construction Traffic Management Plan that includes a designated construction haul route which directs construction traffic away from nearby residential neighborhoods and schools. Though Pico Canyon Elementary may need to adjust boundaries or expand capacity over time, state law (SB 50) holds that payment of school impact fees constitutes full mitigation for potential school impacts. Therefore, the Project would not necessitate constructing new or physically expanded school facilities and would have a less-than-significant impact with mitigation on school services.

Parks. Construction. Construction workers are unlikely to significantly affect park capacities, as they are a transient workforce with short lunch breaks. However, construction-related worker and truck trips would enter and exit the Project site each day, which could result in temporary access impacts to parks using the same roadways as the Project, including Ed Davis Park and Rivendale Park and Open Space. However, implementation of MM-4.17-1 would ensure ingress/egress from the parking lot for Ed Davis Park in Towsley Canyon and at the Taylor Trailhead parking lot is preserved during all phases of Project construction. Therefore, impacts to parks during Project construction would be less than significant with mitigation.

Other Public Facilities. Construction. Beyond fire, sheriff, schools, and parks, the primary public facilities pertinent to the Project are nearby and on-site trails. Construction activities may require brief interruptions to a portion of on-site or nearby trail segments resulting in a potentially significant impact; however, MM-4.17-1 would ensure traffic controls and access would be provided to ensure public trail access is not impeded. Thus, impacts to other public facilities due to Project construction would be less than significant with mitigation

Mitigation Measures:

MM-4.1-1 Visual Shielding Plan (See Aesthetics header under Section 3.)

MM-4.17-1 Construction Traffic Management Plan. (See Transportation header under Section 3.)

MM-4.20-1 Wildfire Education Program. (See Wildfire header under Section 3.)

MM-4.20-2 Alternative Materials and Methods. (See Wildfire header under Section 3.)

MM-4.20-3 Annual Fuel Modification Zone Inspection. (See Wildfire header under Section 3.)

MM-4.20-4 Construction Fire Prevention Plan. (See Wildfire header under Section 3.)

MM-4.20-5 Construction-Related Fire Prevention Measures. (See Wildfire header under Section 3.)

3.12.2 Cumulative Impacts – Public Services

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.15-44 through 4.15-52.)

Facts in Support of Finding: Fire protection in this region is addressed by robust state and local code requirements—including the County Fire Code, Chapter 7A of the CBC for structures in VHFHSZs, and mandatory fuel modification plans—which all cumulative projects must follow. Each cumulative project, including the Project, also pays into the County's Developer Fee Program, funding new or upgraded fire stations and equipment to maintain service ratios; thus, no significant cumulative fire protection impacts would occur. The Project would comply with applicable State and local provisions pertaining to fire safety and emergency response, would pay applicable Developer fees.

All Cumulative Projects would also be subject to applicable fire safety provision of Chapter 7A of the CBC and the County Fire Code, the same as the Project, which require incorporation of building materials, proactive design measures, and construction methods to minimize exposure to and hazards associated with fire and wildfire, thereby reducing the frequency and severity of fire related emergencies within the broader LACoFD service area. Required measures would include compliance with provisions set forth in Title 32, Section 4908 of the County Code (consistent with California Fire Code (CFC) Section 4907, California Government Code Sections 51175–51189, and PRC Section 4291), requiring that fuel modification zones (FMZs) be provided around every building that is designed primarily for human habitation or use within a VHFHSZ. The Fuel Modification Plans prepared for the Project and all Cumulative Projects would be required to be reviewed and approved for defensible space, reasonable fire safety, and compliance with the Fire Code, the Fire Department's Fuel Modification Guidelines, and/or applicable CCR Title 14, Division 1.5, Chapter 7, subchapter 2.

While cumulative growth within the LACoFD service area would result in a need for additional fire protection services to serve new development, these impacts would be mitigated through the County's Developer Fee Program to fund the purchase of fire station sites, the construction of new stations, and the funding of certain capital equipment and compliance with the Fire Code within segments of the service area most likely to experience growth (County of Los Angeles 2014). As the Project would comply with applicable State and local provisions pertaining to fire safety and emergency response, would pay applicable Developer fees, and would implement MM-4.17.1, Construction Traffic Management Plan, during construction, the Project's incremental contribution to fire protection and emergency response services would not be cumulatively considerable, and there would be a less than significant cumulative impact

For sheriff protection, all cumulative projects would likewise contribute to law enforcement facility fees, and local tax revenues would help the LASD adjust staffing and resources as needed, avoiding major service-level declines. Regarding funding for staffing, per Section 22.246.070 (Law Enforcement Facilities Mitigation Fee), of the County's Zoning Code, and Section 17.51.010(B) (Law Enforcement Facilitates Fee) of the Santa Clarita Municipal Code, development of the Project, all of the Cumulative Projects, and other related projects within the City and/or the unincorporated urban expansion areas of Santa Clarita, Newhall, and Gorman, would be required to pay the a law enforcement facilities mitigation fee to mitigate adverse impacts due to the inadequacy of law enforcement facilities that might otherwise occur due to new development (County of Los Angeles 2022b; City of Santa Clarita 2022b). In addition, as the Project and related projects are developed within LASD service areas, tax revenues from property

taxes would be generated and deposited into the County or City General Fund, as determined to be appropriate by the Board of Supervisors. A portion of these revenues would then be allocated, in accordance with the County and City contractual service agreement, to maintain sheriff station staffing and equipment levels. Similar to the Project, all Cumulative Projects, and other "projects" proposed within LASD service areas, would be required to assess the demands placed on local sheriff stations and the staff and facilities needed to serve project related growth, to be supported by the City and County's General Fund, the Law Enforcement Facilitates Mitigation Fee, and other public revenues that occur as a result of urban development. As the Project would comply with payment of the Law Enforcement Facilitates Mitigation Fee and would contribute to the General Fund through taxes levied upon future residents, the Project's incremental contribution to law enforcement services would not be cumulatively considerable, and there would be a less than significant cumulative impact.

Regarding schools, all projects in the Newhall School District and William S. Hart Union High School District must pay statutory fees under Senate Bill 50, deemed by the State to fully mitigate school facility impacts. Although future growth will increase student enrollment, the districts currently have no plans for new or expanded schools, and SB 50 fees offset the cumulative demand. Accordingly, construction of the Project and/or Cumulative Projects would not result in a notable increase in the resident population or generate new students needing to attend local schools. Additionally, Cumulative Projects LA7, LA8, and LA14 would also include schools as part of their projects, which would benefit future residents in the area. Similar to the Project, the Cumulative Projects may have construction management plans that would reduce traffic impacts near schools. Nevertheless, as the Project would implement MM-4.17-1 (Construction Traffic Management Plan), the Project would not make a cumulatively considerable contribution to capacity or service level problems for schools during construction or operational activities, and there would be a less than significant cumulative impact.

In terms of parks, developments in and around Parks Needs Assessment Study Area #49 must provide Quimby Act parkland or pay in-lieu fees, ensuring adequate recreational resources; many of the relevant cumulative projects also include substantial on-site open space or amenities, further reducing potential strain on existing parks. In addition, Cumulative Projects LA4, LA5, LA8, LA9, LA10, and LA14 would contain 70.2 acres and 14 lots of recreational and park amenities on-site, not including open space. Any increase in the use of park facilities would be temporary and would occur during off-peak usage hours (i.e., weekdays compared to weekends when peak park and recreation usage occurs), which would not result in a cumulatively considerable impact regarding construction. The Project along with past, present, and reasonably future projects, would not result in capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for park services. As such, cumulative impacts to parks would be less than significant and would not be cumulatively considerable.

Construction of the Project is not expected to increase demand on existing park facilities to residents of the Project and Cumulative Projects would be serviced by the Stevenson Ranch Library, while Cumulative Projects in the City of Santa Clarita would also be serviced by the Santa Clarita Public Library. Future residential and nonresidential development associated with the Project and Cumulative Projects within unincorporated Los Angeles County would be required to pay the LACL's special tax rate of $34.54 per parcel for the 2024-2025 fiscal year, which may increase annually. Future residential development in the unincorporated County (including the Project and Cumulative Projects LA1 through LA13), would also be required to pay the County's library facilities mitigation fee (Zoning Code Section 22.264.050). According to the LACL, developer fees collected for the Project would mitigate for impacts on the library system. The Project would not result in capacity or service level problems or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental

facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. As such, cumulative impacts to libraries would be less than significant and would not be cumulatively considerable.

Finally, for other public facilities—principally local trails—State and County bond funds, along with property assessments, finance new and existing trail maintenance. Although there is a potential for construction workers to utilize these trail facilities, any resulting increase in the use of these facilities would be temporary and would occur during off-peak usage hours (i.e., weekdays compared to weekends when peak park and recreation usage occurs), which would not be anticipated to result in any cumulatively substantial adverse impacts related to capacity or service level problems or require construction of additional trail facilities. None of the cumulative projects would interfere with existing trails in the Project vicinity. The Project itself would dedicate on-site trails to expand regional connectivity and minimize pressure on off-site trail systems. As none of these public service systems show evidence of exceeding capacity or requiring major new off-site facilities from combined future growth, cumulative impacts to fire protection, sheriff services, schools, parks, and trails would be less than significant with implementation of MM-4.17.1. (DEIR, pp. 4.15-44 through 4.15-52.)

Mitigation Measures:

MM-4.17-1 Construction Traffic Management Plan. (See Transportation header under Section 3.)

3.13 Transportation

3.13.1 4.17a Conflict with Plans

Impact 4.17a Would the project conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.17-15 through 4.17-21.)

Facts in Support of Finding: The applicable plans, policies, and programs addressing the circulation system include SCAG's 2020-2045 RTP/SCS, the County General Plan, the County's Transportation Impact Analysis Guidelines, and the OVOV.

SCAG's 2020-2045 RTP/SCS. The Project would not conflict with the goals of the 2020-2045 RTP/SCS, as further shown in Table 4.17-2 of the DEIR (DEIR, pp. 4.17-15 through 4.17-18). The Project would provide 510 residential units near the Valencia Plaza and multiple regional and local bus lines; the I-5 and The Old Road; and bicycle facilities. As shown in Table 4.17-2, the Project would be consistent, after incorporation of mitigation, with 2020-2045 RTP/SCS goals to encourage economic prosperity; improve mobility, accessibility, reliability, and travel safety; enhance the preservation, security, and resilience of the regional transportation system; increase the productivity of the transportation system, reduce GHG emissions and improvement of air quality; support healthy and equitable communities; adapt to climate change and support an integrated regional development pattern; leverage new transportation technologies and data driven solutions that result in more efficient travel; encourage development of diverse housing types; and promote conservation of natural and agricultural lands and restoration of habitats. Implementation of MM-4.17-2 would require preparation of a Transportation Demand Management Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, the Project would not conflict with the RTP/SCS.

County's Transportation Impact Analysis Guidelines - Operation. Project operation would not result in unacceptable or extended queuing at the applicable intersections and driveways. The study area intersections of The Old Road/Pico Canyon Road and Old Road/Calgrove Boulevard operate at LOS D or better under existing conditions, future conditions, and future plus Project conditions. The 95th percentile queue at the southbound left turn movement at The Old Road/Pico Canyon Road intersection was found to exceed the storage capacity under existing conditions during the PM peak period. Under future conditions, the northbound left turn and southbound left turn pockets are projected to have a queue length that exceeds storage at The Old Road /Pico Canyon Road during the PM peak period. Under future plus Project conditions, Project traffic would not increase the queue at the southbound left turn at The Old Road/Pico Canyon Road intersection. It was determined that the increase in the queue in the northbound left turn lane at the Old Road/Pico Canyon Road intersection would extend in the two-way left-turn lane, and therefore, not contribute to unacceptable levels of queuing at the Old Road/Pico Canyon Road intersection. Both Project driveways along The Old Road are projected to operate acceptably under future plus Project conditions in an unsignalized, side street stop-controlled configuration. Project driveways do not warrant signalization under future plus Project conditions. The Project would be consistent with the operational criteria specified in the County's Transportation Impact Analysis Guidelines and the impact is less than significant with mitigation.

Construction. Regarding construction traffic, there are no pedestrian or transit facilities adjacent to the Project site that could potentially be blocked during construction activities. However, there are public trails nearby that could be affected during construction resulting in a potentially significant impact. MM-4.17-1 requires preparation of a Construction Traffic Management Plan in compliance with the County's Traffic Control Requirements to provide temporary traffic controls and to maintain access within the County public rights-of-way when a temporary disruption of traffic is anticipated. With preparation and implementation of MM-4.17-1, Construction Traffic Management Plan, the Project would not conflict with the criteria specified in the County's Transportation Impact Analysis Guidelines, including access to nearby trails and impacts would be less than significant with mitigation.

OVOV. As discussed within Table 4.11-2 of the DEIR (DEIR, pp. 4.11-42 through 4.11-62), the Project would not conflict with the applicable policies within the OVOV. As such, a less than significant impact would occur in this regard.

Therefore, with implementation of MM-4.17-1 and MM-4.17-2, the Project would not conflict with SCAG's 2020-2045 RTP/SCS, the County General Plan, the County's Transportation Impact Analysis Guidelines, or the OVOV and impacts would be less than significant with mitigation. (DEIR, pp. 4.17-15 through 4.17-21.)

Mitigation Measures:

MM-4.17-1 Construction Traffic Management Plan. Prior to construction of the Project, the Applicant shall prepare a detailed Construction Traffic Management Plan, that shall be prepared in accordance with the County's Requirements For Temporary Traffic Controls For Lane Closures, Street Closures And Detours and supplemental to Part 6 of the Greenbook Standard Specifications for Public Works Construction, subject to County review and approval. The Plan shall include, but not be limited to, the following:

- Maintain existing access for land uses in proximity of the Project site throughout construction, unless otherwise approved by the County.
- Schedule deliveries and pick-ups of construction materials to non-peak travel periods, to the maximum extent feasible.

- Coordinate deliveries and pick-ups to reduce the potential of trucks waiting to load or unload for protracted periods of time.
- Minimize obstruction of through traffic lanes on The Old Road and ensure adequate evacuation capabilities of the Project site and nearby developed areas that may require use of The Old Road during evacuations. Use flag persons as needed to ensure safe traffic operations along The Old Road.
- If any lane closure is necessary, include detailed safety precautions for pedestrians and bicyclists to allow for safe passage such as alternate routing, protection barriers, and appropriate signage.
- Construction equipment traffic from the contractors shall be controlled by flagman.
- Identify designated transport routes for heavy trucks (in addition to haul trucks) to be used throughout Project construction.
- Schedule vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on the surrounding streets.
- Install temporary construction signs to warn vehicular traffic of reduced speed limits in construction zone.
- Establish requirements for loading/unloading and storage of materials on the Project site, where length of time traffic travel lanes could be encumbered and/or sidewalk closings or pedestrian diversions would be implemented, to ensure the safety of the pedestrians.
- Coordinate with adjacent property owners and emergency service providers to ensure adequate access to the Project site and surrounding uses.
- Limit potential roadway lane closure(s) to off-peak travel periods.
- Identify a contact person in the Construction Traffic Management Plan that would be available to oversee implementation of the Plan and address any community concerns.

MM-4.17-2 Transportation Demand Management (TDM) Program. Prior to issuance of final map recordation, the Project Applicant shall prepare a TDM Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking for residents. The TDM Program shall be subject to review and approval by the Los Angeles County Department of Regional Planning and Los Angeles County Public Works. The exact measures to be implemented shall be determined when the TDM Program is prepared, prior to issuance of a final map recordation for the Project. The following TDM measures are based on measures by the California Air Pollution Control Officers Association (CAPCOA) publication, *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (2021). The TDM Program must include, but would not be limited to, the following:

A. **Locating the Project near a Bike Lane; Improving Bike Boulevard; Expand Bikeway Network:** The Project shall include a Class III bicycle route on the proposed "A" Street, "B" Street, and the gated private access road on-site, which would connect to Los Angeles County's future Class II bicycle lane along the Project frontage on The Old Road.

B. **E-Bikeshare System:** The Project shall include an E-bike loaner program (separate from the publicly accessible options in the City of Santa Clarita) to provide residents with short-term

access for trips. This program shall be active for five years following an initial deposit by the Project Applicant.

C. **Provide Community-Based Traveling Planning:** The Project shall provide households with customized information, incentives, and support to encourage the use of transportation alternatives in place of single occupancy vehicles, thereby reducing household vehicle miles traveled (VMT). The Project shall create a ridesharing program for school children. Most school districts provide bussing services to public schools only. School Pool helps match parents to transport students to private schools or to schools where students cannot walk or bike and do not meet the requirements for bussing.

D. **Carpool/Vanpool Incentives:** The Project shall include monetary assistance with fares or gas costs for carpool/vanpool users. This incentive shall be active for three years following an initial deposit by the Project Applicant.

E. **Implement Subsidized or Discounted Transit Program:** The Project shall provide subsidized/discounted daily or monthly public transit passes. This incentive shall be active for three years following an initial deposit by the Project Applicant.

3.13.2 4.17c Hazards Due to a Road Design Feature

Impact 4.17c Would the project substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?

Finding: Less Than Significant Impact with Mitigation (DEIR, p. 4.17-25.)

Facts in Support of Finding: Construction. No existing hazardous design features such as sharp curves or dangerous intersections exist on Project site or in the Project vicinity. There are no pedestrian or transit facilities adjacent to the Project site that could potentially be blocked during construction activities. However, there are trails near the Project site that could be impacted during construction resulting in a potentially significant impact. A temporary traffic control and access plan is required to permit activity within the County public right-of-way when temporary disruption of traffic is required. MM-4.17-1 requires preparation of a Construction Traffic Management Plan in compliance with the County's Traffic Control Requirements to provide temporary traffic controls and access within the County public rights-of-way when temporary disruption of traffic is anticipated. With preparation and implementation of a Construction Traffic Management Plan, potential hazards related to safe trail access during construction would be less than significant with mitigation. (DEIR, p. 4.17-25.)

Mitigation Measures:

MM-4.17-1 Construction Traffic Management Plan.

3.13.3 4.17d Emergency Access

Impact 4.17c Would the project result in inadequate emergency access?

Finding: Less Than Significant Impact with Mitigation (DEIR, p. 4.17-26.)

Facts in Support of Finding: The Project would provide a total of two vehicle access points via two unsignalized driveways from The Old Road. As a component of the Project, emergency vehicle access via "A" Street and "B"

Street would be provided, in addition to a private access road. All egress-ingress easements would be built to meet all minimum fire apparatus access requirements of the County Fire Code to the property west of the Project site, proposed Tentative Tract Map (TTM) 74979. Consistent with Title 21, Subdivisions, of the County Code, the Project's roadways have been designed to meet all County access requirements. The Project would also comply with all applicable County Fire Code requirements related to access (i.e., roadway widths, all-weather surface requirements, length of streets, turning requirements, grade restrictions, maintenance requirements, and parking restrictions). Furthermore, the Project includes on-site locations to safely shelter in place, improved road conditions, an alternative evacuation route to I-5, and adheres to all State buildings codes to minimize the spread of a wildfire, which would also increase emergency access to and from the site. MM-4.20-1 would require that the HOA prepare an educational program with wildfire-related information to be provided to all residents and occupants, including a Wildfire Evacuation Plan, and the Fire Protection Plan (FPP) requirements. MM-4.17-1 would ensure adequate emergency access to the Project site during construction.

Because the Project's access points and driveways would be designed in accordance with applicable Public Works Department Standard Plans, the Project site would be accessible to emergency responders during construction and operation of the Project. Implementation of MM-4.20-1 and MM-4.17-1 would ensure proper emergency access to the Project site. Therefore, impacts associated inadequate emergency access would be less than significant with mitigation. (DEIR, p. 4.17-26.)

Mitigation Measures:

MM-4.17-1 Construction Traffic Management Plan.

MM-4.20-1 Wildfire Education Program. (See Wildfire header under Section 3.).

3.13.4 Cumulative Impacts – Transportation

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.17-26 through 4.17-29.)

Facts in Support of Finding: The three cumulative residential projects applicable to transportation are subject to local and regional circulation policies and, like the Project, must implement construction-specific traffic management plans to minimize impacts on transit, roadways, and bicycle/pedestrian facilities. As a result, and with the inclusion of MM-4.17-1, any temporary cumulative construction-related effects would be less than significant.

Operationally, the Project's traffic—examined for future conditions with and without the Project—was not found to cause unacceptable levels of service or queuing. Regarding VMT, the SCAG RTP/SCS Travel Demand Model indicates that while the Project would initially raise residential VMT per capita above the baseline, implementing mitigation measure MM-4.17-2 would reduce it below the County's threshold for significance, resulting in a less than significant cumulative impact. Further, the Project would not create unsafe road designs or introduce incompatible uses, given that Project driveways and any similar features in the cumulative projects must adhere to relevant design standards and would not overlap in a way that causes significant hazards. Finally, emergency access would be adequate, as all projects must comply with local fire codes and County roadway design requirements, and the Project's design would enhance emergency ingress and egress for both the site and the nearby LA2 project. Therefore, cumulative transportation impacts would be less than significant with mitigation. (DEIR, pp. 4.17-26 through 4.17-29.)

Mitigation Measures:

MM-4.17-1 Construction Traffic Management Plan.

MM-4.17-2 Transportation Demand Management (TDM) Program.

3.14 Tribal Cultural Resources

3.14.1 4.18a(i)(ii) Substantial Adverse Change in the Significance of a Tribal Cultural Resource

Impact 4.18a(i)(ii) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k); or (ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.18-11 through 4.18-12.)

Facts in Support of Finding: No tribal cultural resource (TCR), as defined by CEQA Section 15064.5, has been identified within the Project site as a result of previous or current investigations. Therefore, the Project would not adversely affect a known TCR listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, as defined in PRC Section 5020.1(k). However, considering that a substantial portion of the Project site is undisturbed and includes intact native soils, there is a potential that yet unknown TCRs that have the potential for listing in the California Register of Historical Resources, or in a local register of historical resources may exist, which would result in a potentially significant impact. Furthermore, based on evidence provided by the consulting Tribe (the Fernandeño Tataviam Band of Mission Indians), there is a potential that yet unknown TCR(s) exist that would be determined significant pursuant to criteria set forth in PRC Section 5024.1(c). Therefore, in its discretion, the County determined that there is a potential for TCRs within or near the Project site that meets the threshold of a resource determined to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1.

Implementation of MM-4.18-1 through MM-4.18-3 are required to reduce impacts to less than significant. MM-4.18-1, Retention of Native American Monitoring, requires the retention of a Native American monitor to observe initial ground disturbing activities occurring from one foot above native soils and up to five feet below the surface of native soils. MM-4.18-2, WEAP, requires the retained Native American monitor/entity to be notified of the location and timing of the WEAP training. MM-4.18-3, Inadvertent Discovery Clause, outlines protocols to address inadvertent discoveries and requires all construction work occurring within no less than 60 feet of an inadvertent find to be halted and the retained Native American monitor/entity (procured by the Fernandeño Tataviam Band of Mission Indians) be notified. Therefore, with implementation of MM-4.18-1 through MM-4.18-3,

the impact regarding a potential substantial adverse change in the significance of a TCR would be reduced to less than significant with mitigation. (DEIR, pp. 4.18-11 through 4.18-12.)

Mitigation Measures:

MM-4.18-1 Retention of Native American Monitoring. Prior to the commencement of any ground disturbance activities, the applicant/owner/developer shall retain a Native American monitor/entity procured by the Fernandeño Tataviam Band of Mission Indians. The applicant/owner/developer shall make arrangements with the retained Native American monitor/entity to enter into a Native American Monitoring Agreement with the intent of securing a total of one Native American monitor to be present during initial ground disturbance (including testing, clearing, grubbing, and grading operations) occurring from one foot above native soils and up to five feet below the surface of native soil. Initial ground disturbance is defined as initial construction-related earthmoving of sediments from their place of deposition. This definition excludes movement of sediments after they have been initially disturbed or displaced by current Project-related construction. More than one monitor may be required if multiple areas within the Project site are simultaneously exposed to initial ground disturbance causing monitoring to be hindered by the distance (more than 100 feet apart) of the simultaneous activities.

MM-4.18-2 Workers Environmental Awareness Program. The retained Native American monitor/entity procured by the Fernandeño Tataviam Band of Mission Indians (as detailed in MM-4.18-1, above) shall be notified by the applicant/owner/developer of the time and location of the Worker Environmental Awareness Program (WEAP) training no later than 72 hours prior to its scheduled occurrence. The applicant/owner/developer shall provide the retained Native American monitor/entity the access and opportunity to participate in the WEAP training. For further details and requirements pertaining to the WEAP training, please see MM-4.5-2.

MM-4.18-3 Inadvertent Discovery Clause. In the event that potential prehistoric or historic-era Native American/Tribal resources (sites, features, or artifacts) are exposed during construction activities for the Project, all construction work occurring within 60 feet of the find shall immediately stop and the retained Native American monitor/entity procured by the Fernandeño Tataviam Band of Mission Indians (as detailed in MM-4.18-1, above) must be notified promptly. The find shall be assessed by the retained Principal Investigator/Archaeologist (as detailed in MM-4.5-1) in consultation with the retained Native American monitor/entity. Consultation shall assess and document potential finds in real time to determine whether or not additional study is warranted.

In the event that human remains and associated funerary objects are inadvertently encountered during construction activities, the remains and funerary objects shall be treated in accordance with state and local regulations that provide requirements with regard to the accidental discovery of human remains, including California Health and Safety Code Section 7050.5, PRC Section 5097.98, and CEQA Guidelines Section 15064.5(e). In accordance with these regulations, if human remains are found, the County Coroner must be immediately notified of the discovery. Additionally, the retained Native American monitor/entity must be notified of the discovery immediately. No further excavation or disturbance of the Project site or any nearby (no less than 100 feet) area reasonably suspected to overlie adjacent remains can occur until the County Coroner has determined, within 2 working days of notification of the discovery, if the remains are

potentially human in origin. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she is required to notify the Native American Heritage Commission (NAHC) within 24 hours. The NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant must then complete their inspection within 48 hours of being granted access to the site. The most likely descendant would then determine, in consultation with the property owner, the disposition and treatment of the human remains.

3.14.2 Cumulative Impacts – Tribal Cultural Resources

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.18-12 through 4.18-14.)

Facts in Support of Finding: No significant TCRs, as defined under PRC Section 21074 eligible for listing in the California Register of Historical Resources (or meeting other applicable criteria), were identified on the Project site through Tribal consultation or records searches. Although unknown TCRs could potentially exist, the Project and all cumulative projects must comply with PRC 21083.2, Assembly Bill 52, and Senate Bill 18 requirements (if applicable), ensuring consultation with affiliated tribes and the evaluation of potential TCRs prior to site development. Because TCRs are considered non-renewable resources the damage, loss or alteration of TCRs is considered a significant cumulative impact. If TCRs are discovered during ground-disturbing activities, both the Project and cumulative projects must implement standard protection measures and mitigation (e.g., MM-4.18-1 through MM-4.18-3 for the Project), which reduce impacts to less than significant by requiring monitoring and appropriate treatment protocols. Because there are no currently known TCRs on the Project site and mandatory mitigation would apply if unidentified TCRs are encountered, the Project would not contribute to a cumulatively considerable impact on TCRs. Consequently, any adverse changes to TCRs, whether recognized in a historic register or deemed significant by the lead agency, would be minimized under existing regulations and project-specific mitigation, resulting in a less than significant cumulative impact with mitigation. (DEIR, pp. 4.18-12 through 4.18-14.)

Mitigation Measures:

MM-4.18-1 Retention of Native American Monitoring.

MM-4.18-2 Workers Environmental Awareness Program.

MM-4.18-3 Inadvertent Discovery Clause.

3.15 Wildfire

3.15.1 4.20a Adopted Emergency Response Plan or Emergency Evacuation Plan

Impact 4.20a If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.20-22 through 4.20-28.)

Facts in Support of Finding: Construction. Project construction of off-site improvements would require temporary lane closures along The Old Road, identified as a potential evacuation route, affecting access to I-5. If an evacuation of the Project area were to occur during construction of the proposed off-site improvements. Use of The Old Road between Pico Canyon Road and Calgrove Boulevard could be limited for evacuation of existing populations, resulting in a potentially significant impact. However, a Construction Traffic Management Plan (in accordance with MM-4.17-1) would minimize disruptions and maintain emergency access, reducing impacts to less than significant. MM-4.17-1 requires the minimization of obstructions in traffic lanes, maintenance of emergency access throughout construction activities through methods such as the use of flag persons to minimize obstructions along The Old Road, signage, scheduling of vehicle movements to ensure traffic flow, and limiting schedule of deliveries and truck traffic, among other requirements. With incorporation of MM-4.17-1 short-term construction-related impacts related to impairment of an emergency response or evacuation plan would be less than significant.

Operation. Once operational, the Project would introduce new residents who may require evacuation in a wildfire emergency, potentially adding to traffic on designated evacuation routes. The Project site is located in proximity to several potential evacuation routes, and connections would be established between the Project site and these potential routes. Specifically, regional access to the Project site is provided via I-5, which is located approximately 250 feet east of the Project site. The Project would provide two vehicle access points via two unsignalized driveways from The Old Road, which in turn provides connectivity to I-5. Additionally, the Project design would provide sufficient emergency access. As a component of the Project, emergency vehicle access via "A" Street and "B" Street would be provided, in addition to the private access road that would encircle the outer edge of the development area. An ingress/egress easement would be built to meet all minimum fire apparatus access requirements of the County Fire Code to the property west of the Project site, proposed TTM 74979. Consistent with Title 21, Subdivisions, of the County Code, the Project's roadways would meet all County access requirements. The County Fire Code requirements describe the applicable County access standards (i.e., roadway widths, all-weather surface requirements, length of streets, turning requirements, grade restrictions, maintenance requirements, and parking restrictions), which would be implemented by the Project as part of code compliance.

During a wildfire emergency, circumstances may arise in which LACoFD or law enforcement determines that sheltering in place would be safer than evacuating. The Project would thus provide a temporary refuge area for firefighters, occupants, and nearby residents to shelter should LACoFD or law enforcement determine this a safer approach than evacuations. Temporary refuge areas are pre-planned areas (planned shortly after firefighters arrive on scene) where firefighters may take refuge and temporary shelter for short-term thermal relief, without using a fire shelter in the event that escape routes to an established safety zone are compromised. For the Project, temporary refuge areas would likely include navigating to the interior roadways of neighborhoods where 200-foot-wide FMZs provide defensible space and maintained landscapes are provided, along with ignition-resistant structures that offer numerous opportunities for temporary refuge. Temporary refuge areas would not replace the principles of Ready! Set! Go!, the County's public awareness and preparedness program targeted to individuals living and/or working in WUI areas but rather would provide an additional option to aid in the safe evacuation of the Project site. Evacuation modeling shows that both existing and Project populations could safely evacuate within the 90-minute timeframe recommended by FEMA.

While the site is served by nearby fire stations, LACoFD determined that a new station is not needed, and the Project includes payment of fire facility fees and features such as multiple egress points, a potential shelter-in-place option, and compliance with state and local fire code requirements. The Project would meet the County's response time standard for suburban areas with a total estimated response time of 7 minutes and 19 seconds from the closest fire station (Station 124). This analysis considers the response time provided by LACoFD, which exceeds the

LACoFD's response time standard of 8 minutes. To enhance preparedness, MM-4.20-1 mandates a Wildfire Education Program and public outreach, including regular education, alert notifications, and guidance for special populations and pets.

Consequently, with implementation of MM-4.17-1 and 4.20-1 and consistency with the County's existing Operational Area Emergency Response Plan, the Project's construction and long-term operations would not substantially impair emergency response or evacuation, resulting in a less than significant impact with mitigation. (DEIR, pp. 4.20-22 through 4.20-28.)

Mitigation Measures:

MM-4.17-1 Construction Traffic Management Plan. (See Transportation header under Section 3.)

MM-4.20-1 Wildfire Education Program. The Homeowners' Association (HOA) Covenants, Conditions, and Restrictions for the Project shall require that the HOA include a Fire Safety Coordinator position as part of the HOA Board, who shall be responsible for preparing and implementing an educational program with wildfire-related information, including the Wildfire Evacuation Plan (WEP) and the Fire Protection Plan (FPP) requirements, to be provided to all residents and occupants, including residents and occupants of the senior affordable housing units. Similarly, the Property Manager(s) of the senior affordable housing shall serve as the Fire Safety Coordinator for the affordable housing residents and shall be responsible for preparing and implementing an educational program with wildfire-related information. The Covenants, Conditions, and Restrictions will be submitted to the County of Los Angeles (County) prior to issuance of certificate of occupancy. The educational program shall be prepared in easy-to-understand, graphically based materials and shall be annually reviewed and updated, as appropriate, in order to maintain high wildfire awareness. Program features shall include, but may not be limited to, the following:

1. ***Biannual email and mailers:*** Residents and occupants of all dwelling units on the Project site, including the senior affordable housing rental units, shall be provided with biannual emails and mailers in April and in August that include information such as reminders about annual defensible space inspections, how to prepare for wildfire season, evacuation information, prohibited high-risk activities, and how to prevent wildfires. Links to various resources on where to get trusted information, such as the Los Angeles County Fire Department (LACoFD), 211 Los Angeles County, and Ready Los Angeles County, shall be provided and updated annually, as necessary. Additionally, at least once a year, information on the following shall be provided in the email and mailer: (1) how to notify the County Office of Emergency Management (OEM) and Health and Human Services of special needs and/or required accommodations (Accessible Alert LA County, CERT programs, or other), for transportation or other special services; and (2) how to prepare for evacuation of pets and how to register for assistance with pet evacuations.
2. ***Website:*** A dedicated community website shall be developed and maintained by the HOA with more detailed information and resources about wildfire awareness, prevention, and evacuation. The website address shall be sent to all residents of the Project including occupants of the senior affordable housing units. The website shall serve as a centralized resource for the fire and evacuation education program and include information from the FPP and WEP. In addition to general emergency preparedness education, the website shall include information that is included in emails, mailers, and workshops/webinars. The website shall

have up-to-date fire watch and red flag warning alerts, as well as information on restrictions during fire weather conditions. Residents shall also be able to use the website to sign up for an annual residential defensible space inspection from the HOA fire safety committee.

3. ***New resident packet:*** All residents and new residents in the future shall be presented with a wildfire awareness and safety package upon purchase or rental of a residence. Within the package will be a USB drive with the WEP, FPP (which includes information on the regional fire hazard, how to build a go-bag, and tools to prepare a household evacuation plan), and a list of agencies and resources for receiving trusted information.
4. ***Emergency alert campaign:*** Residents shall be encouraged to sign up for Alert LA County. Alert LA County is the mass notification system for emergency alerts, weather alerts, health notifications, building alerts, and other updates from County, state, and federal agencies. Reminders shall be sent out in the biannual mailers and emails, on the community website, in the workshops, and in the new resident package.
5. ***Trail signage:*** Signs shall be placed at the new trailhead to provide all users with information about how to safely use the trail and shall include restrictions on smoking and firearm usage. Signs shall be evaluated annually by the HOA to ensure proper maintenance.
6. ***HOA fire safety committee:*** The HOA shall establish a fire safety committee, which shall include the owner and property manager(s) from the senior housing that is responsible for overseeing the maintenance of community-wide fire protection features. Residents will be able to report fire hazards or hazardous fuel conditions to the HOA committee for remediation. The committee shall be responsible for the coordination of the third party fuel modification zone (FMZ) inspections and the volunteer residential defensible space inspections. The committee shall also be responsible for the creation and distribution of the educational program for the Project. The committee shall serve as a communication link between LACoFD and the community.
7. ***Senior Housing Carpool Program:*** The Fire Safety Coordinator shall be responsible for creating a senior housing carpool program available for all residents on the project site, including the senior affordable rental units. The program shall ensure that all seniors who are not able to safely evacuate on their own are accounted for and transported during an emergency evacuation.

3.15.2 4.20b Wildfire Risks due to Slope, Prevailing Winds, and Other Factors

Impact 4.20b — Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.20-28 through 4.20-43.)

Facts in Support of Finding: Construction. Project construction would introduce potential ignition sources to the Project site, including the use of heavy machinery and the potential for sparks during welding activities or other hot work. This could result in an exacerbation of wildfire risk and expose the temporary Project occupants (construction workers) to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire.

The Project would be required to comply with County, state, and LACoFD requirements for construction activities in hazardous fire areas, including fire safety practices, to reduce the possibility of fires during construction activities.

In addition to compliance with all applicable regulations described above, mitigation is required to further address the potential for construction activity-related wildfire hazards due to the Project's location in the WUI. As required in MM-4.20-4, Construction Fire Prevention Plan, fire safety measures will be implemented to reduce the possibility of fires during the construction phase. Further, MM-4.20-5, Construction-Related Fire Prevention Measures, requires vegetation management to be implemented at the start of and throughout all phases of construction, and prohibits combustible materials on site until adequate fuel modification is implemented. Combustible materials must not be brought on site without prior Fire Department approval. Further, all new permanent power lines would be undergrounded for fire safety purposes, which would eliminate the risk of ignitions via contact between transmission lines and tree canopies or other vegetation. Any temporary construction power lines would only be permitted in areas that have been cleared of vegetation to prevent ignition. The pre-construction requirements outlined in MM-4.20-4 and MM-4.20-5 would reduce the risk of wildfire ignition and spread on the Project site during construction activities. Taken together, these layered measures and code compliance would ensure Project construction would not substantially worsen wildfire risk or expose occupants to severe fire or smoke hazards, resulting in less-than-significant impacts with mitigation.

Operation. Due to the Project site's location on hilly terrain near open space, there is a potential for wind-driven wildfires; however, the Project would cluster development on flatter areas, convert slopes to irrigated areas and thin and reduce existing fuel sources, and implement a robust defensible space or FMZ up to 200 feet around structures. All new structures must use ignition-resistant materials (consistent with County Fire Code and Chapter 7A of the CBC) and feature interior sprinklers, while new power lines would be undergrounded. Modeling shows that by replacing potential sources of fuel for wildfire with ignition-resistant development, the Project would reduce flame lengths and fire-spread rates to manageable levels, rather than exacerbate wildfire risks. While ignition sources are already present in the Project area, the Project would introduce additional sources. However, the incremental increase in potential fire ignition by adding the Project's population is demonstrably minimal. Within certain areas of the Project site, achievement of the required 200-foot FMZ would not be feasible. The development footprint would be clustered within flatter areas of the Project site to avoid prominent ridgelines; however, this configuration necessitates placement of structures closer than 200 feet to the property line, and the HOA would not have access or approvals to conduct fuel modification and vegetation thinning outside of the Project site boundaries. Areas of reduced FMZ would be generally located near the Project site's eastern boundary. Reduced on-site FMZs would be considered a significant impact, as the Project itself would not provide adequate on-site buffer to keep wildfire from encroaching on site or moving off site. MM-4.20-2 ensures that additional fire protection measures are implemented to effectuate the same level of protection as a 200-foot on-site FMZ, even though off-site fuel modification would occur to attain the 200 feet. LACoFD recognizes the additional fire protection measures but does not provide approval of alternative materials and methods approaches to reducing FMZ, requiring the full FMZ width of 200 feet and requiring the neighboring property owner to provide that vegetation management. Implementation of MM-4.20-2 would require enhanced construction features such as a 6-foot, heat-deflecting wall constructed of concrete masonry units between 16 on-site structures in the southern portion of the Project and adjacent open space. Ongoing FMZ inspections (per MM-4.20-3) and homeowner education (per MM-4.20-1) would further reduce ignition potential. Improved water supply and road access would facilitate both fire response and safe evacuation. Adherence to these mitigation measures as well as state and local fire codes would ensure the impact is reduced to less than significant with mitigation. (DEIR, pp. 4.20-28 through 4.20-43.)

Mitigation Measures:

MM-4.20-1 Wildfire Education Program.

MM-4.20-2 Alternative Materials and Methods. Prior to the execution of any contract with a construction contractor, the Project Applicant/Developer shall ensure that the following requirements shall be placed on the construction contractor's contract specification:

All residential structures shall be built using ignition-resistant materials pursuant to the most recent Los Angeles County (County) Fire and Building Codes (Chapter 7A, focusing on structure ignition resistance from flame impingement and flying embers in areas designated as high fire hazard areas). The following are additional ignition-resistant construction requirements, beyond existing code requirements:

1. The 16 residences included in the southeastern portion of the Project site (within Lot 5 of the Tentative Tract Map) adjacent to the off-site open space area shall include the following features for additional fire prevention, protection, and suppression (Figure 4.20-2, Fuel Modification Zones, of the Draft EIR):
    a. Windows on structures facing the open space areas shall include dual panes, with both panes tempered.
    b. Exterior walls and doors shall be constructed to a standard of minimum 1-hour fire rated with one layer of 5/8-inch type X gypsum sheathing applied behind the exterior covering or cladding on the exterior side of the framing, from the foundation to the roof, for all exterior walls of each building.
    c. Exterior vents shall be ember-resistant (recommend BrandGuard, O'Hagin, or similar vents approved by LACoFD).
    d. A solid 6-foot-tall wall shall be constructed of concrete masonry units between on-site structures and off-site open space.

Proof of compliance shall be provided to the County prior to issuance of a certificate of occupancy for homes that require these additional fire prevention, protection, and suppression features.

MM-4.20-3 Annual Fuel Modification Zone Inspection. The Homeowners' Association (HOA) Covenants, Conditions, and Restrictions shall require annual fuel modification inspections to be conducted to confirm and document compliance with fuel modification maintenance requirements, as defined in the Los Angeles County Fire Department (LACoFD) approved fuel modification plan. The HOA shall obtain a fuel modification zone (FMZ) inspection and report in May/June of each year to document and certify that vegetation management activities throughout the Project site have been performed. If the FMZ areas are not compliant, the HOA shall have a specified period to correct any noted issues, and re-inspection shall be required to achieve the annual certification of compliance. Documentation of compliance shall be retained by the HOA and provided to LACoFD upon request.

MM-4.20-4 Construction Fire Prevention Plan. Prior to the commencement of construction activities, the Project Applicant/Developer shall prepare a construction fire protection plan (FPP) that requires the training of construction personnel and provides details related to fire-suppression procedures and equipment to be used on-site during construction. The construction FPP shall be consistent with the requirements in California Building Code Chapter 33 and California Fire Code Chapter 33, shall be subject to review and approval of the Los Angeles County Fire Department (LACoFD), and shall include the following:

- Protocols for conducting mandatory Project-specific environmental awareness training for all on-site construction workers, including the requirement to conduct the training prior to any grubbing or ground disturbance, and requirements for ongoing training to occur prior to commencement of each phase of construction
- Requirements to conduct and document construction worker trainings, which shall include protocols for minimizing potential ignition activities, vegetation clearing, parking requirements/restrictions, equipment/vehicle idling restrictions, smoking restrictions, initial attack firefighting, proper use of gas-powered equipment and storage of flammable fuels, use of spark arrestors, fire reporting, and hot work restrictions
- LACoFD-approved construction work restrictions during red flag warnings and high to extreme fire danger days
- Specifications for access to adequate water supplies and/or water trucks to service construction activities
- Documentation of emergency contact information and protocols for on-site emergency response communication to on-site workers, coordination with local fire agencies, and reporting/documentation procedures for actions taken
- Designation of an on-site fire awareness coordinator with itemized description of their role and responsibility for ensuring compliance with the construction FPP, including demonstration of compliance with applicable plans and policies established by state and local agencies and documentation of completion of required construction worker trainings

MM-4.20-5 Construction-Related Fire Prevention Measures. Prior to the execution of any contract with a construction contractor and issuance of grading permits, the Project Applicant/Developer shall ensure that the following requirements shall be placed on the construction contractor's contract specification:

- All required fuel modification for each phase of construction activity shall be implemented prior to commencement of that phase and prior to combustible building materials being delivered to the site.
- Prior to bringing lumber onto the Project site, improvements within the active development area shall be in place, including utilities, operable fire hydrants, an approved, temporary roadway surface, and fuel modification zones (FMZs) established pursuant to the construction fire protection plan (FPP) and Los Angeles County Fire Department (LACoFD) requirements.
- All temporary construction power lines shall only be allowed in areas that have been cleared of combustible vegetation.

All-new permanent power lines shall be installed underground for fire safety purposes.

3.15.3 4.20c Installation or Maintenance of Associated Infrastructure

Impact 4.20c If located in or near state responsibility areas or lands classified as VHFHSZ, would the project require the installation or maintenance of associated infrastructure (such as roads,

fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.20-43 through 4.20-48.)

Facts in Support of Finding: Construction. The Project would introduce various infrastructure components—including roads, trails, utilities, a water tank, and FMZs—in a VHFHSZ, potentially increasing wildfire risks during both construction and operation. During construction, activities such as grubbing, heavy machinery use, and hot work could ignite surrounding vegetation, but compliance with the County Fire Code and implementation of a FPP in accordance with MM-4.20-4 and construction-related fire prevention measures per MM-4.20-5 would minimize these risks to reduce impacts to less than significant with mitigation.

Operation. Once operational, the Project would maintain a fuel modification plan consistent with the County Fire Code, installing and annually inspecting FMZs up to 200 feet to thin or remove combustible vegetation per MM-4.20-3, while all new power lines would be undergrounded to reduce ignition potential. Roads would meet fire department access standards including landscape and hardscape to minimize the potential of ignition, and water system upgrades (e.g., a 2-million-gallon storage tank) would provide adequate fire flow. Because these requirements collectively ensure that construction and operation of the Project would not exacerbate wildfire risk and any temporary or ongoing environmental effects would remain less than significant with mitigation. (DEIR, pp. 4.20-43 through 4.20-48.)

Mitigation Measures:

MM-4.20-3 Annual Fuel Modification Zone Inspection.

MM-4.20-4 Construction Fire Prevention Plan.

MM-4.20-5 Construction-Related Fire Prevention Measures.

3.15.4 4.20d Significant Risks as a Result of Runoff, Post-Fire Slope Instability, or Drainage Changes

Impact 4.20d Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.20-50 through 4.20-52.)

Facts in Support of Finding: Operation. During operation, the Project would introduce new populations into the WUI; therefore, the Project could have the potential to result in potentially significant impacts through exposure of people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. The Project's drainage system—which includes debris basins and improved stormwater infrastructure—would reduce runoff and sedimentation, while FMZs would be strategically thinned rather than entirely cleared, preserving root structures to help anchor soil. The Project would remove wildland fuels and replace it with ignition resistant buildings, irrigated landscaping, and paved streets. The FMZs would be maintained on a regular basis to provide additional areas of protection by removing flashy fuels. The

Project would also restore over 15 acres of ignition prone upland mustard in the On-site Conservation Area to oak woodlands. As such, the Project is expected to provide an overall decrease in wildfire ignition in the vicinity of the Project and would be expected to be a barrier to wildfire spread. In addition, implementation of MM-4.20-1, MM-4.20-2, and MM-4.20-3 would reduce wildfire risk, maintain defensible space, and ensure annual inspections of fuel modification zones. With these measures, code compliance, and ongoing maintenance, the Project would not expose people or structures to significant post-fire hazards, resulting in less than significant impacts with mitigation. (DEIR, pp. 4.20-50 through 4.20-52.)

Mitigation Measures

MM-4.20-1 Wildfire Education Program.

MM-4.20-2 Alternative Materials and Methods.

MM-4.20-3 Annual Fuel Modification Zone Inspection.

3.15.5 4.20e Significant Risk of Loss, Injury or Death Involving Wildland Fires

Impact 4.20e If located in or near state responsibility areas or lands classified as VHFHSZ, would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.20-52 through 4.20-53.)

Facts in Support of Finding: The Project site is within a VHFHSZ within a State Responsibility Area. Construction activities and operation of the Project have the potential to increase wildfire risk on site. Therefore, the Project could expose people and structures, directly and indirectly, to a significant risk of loss, injury or death involving wildfires, and impacts could be potentially significant. The Project would introduce ignition-resistant landscaping, a FMZ of up to 200 feet, enhanced structural features, and improved firefighting access to minimize fire spread potential if a wildfire were to occur. Where the FMZ is less than 100 feet on site, neighboring property owners must provide brush thinning off site, and MM-4.20-2 requires additional construction protections for these areas. Modeling shows that these measures—along with building to County Fire Code standards, installing automatic sprinklers, and upgrading water delivery systems—would reduce fire behavior enough for effective response. Further, regular vegetation maintenance (per MM-4.20-3), an FPP (per MM-4.20-4), and construction fire prevention measures (per MM-4.20-5) would limit short-term ignition hazards, while an ongoing Wildfire Education Program (per MM-4.20-1) would ensure residents remain prepared. Taken together, these measures ensure that the Project would not exacerbate wildfire risks, and any potential threat to people or structures would be less than significant with mitigation. (DEIR, pp. 4.20-52 through 4.20-53.)

Mitigation Measures:

MM-4.20-1 Wildfire Education Program.

MM-4.20-2 Alternative Materials and Methods.

MM-4.20-3 Annual Fuel Modification Zone Inspection.

MM-4.20-4 Construction Fire Prevention Plan.

MM-4.20-5 Construction-Related Fire Prevention Measures.

3.15.6 Cumulative Impacts – Wildfire

Finding: Less Than Significant Impact with Mitigation (DEIR, pp. 4.20-54 through 4.20-62.)

Facts in Support of Finding: When considered cumulatively, the Project and other Cumulative Projects would introduce additional people, structures, and infrastructure into VHFHSZs, potentially increasing both construction-related and operational wildfire risks, resulting in a potentially significant cumulative impact.

During construction, all projects in the County must comply with extensive fire safety regulations—such as County Fire Code Chapters 33 and 326—which mandate spark arresters on equipment, red flag day restrictions, and readily available water sources or fire watch personnel. For the Project specifically, MM-4.20-4 and MM-4.20-5 would ensure that vegetation is thinned or removed before combustible materials are introduced on-site, thereby limiting ignition potential. MM-4.20-1 The Project would implement MM-4.17-1, which requires the minimization of obstructions in traffic lanes, maintenance of emergency access throughout construction activities through methods such as the use of flag persons to minimize obstructions along The Old Road, signage, scheduling of vehicle movements to ensure traffic flow, and limiting schedule of deliveries and truck traffic, among other requirements. Therefore, due to compliance with robust regulatory requirements that are applied to all new development projects within a VHFHSZ, and due to the Project-specific mitigation applicable to the Project site, short-term construction activities would not result in cumulatively considerable impacts that could result in a cumulatively considerable impact (DEIR, pp. 4.20-54 through 4.20-62.).

At an operational level, both the Project and other cumulative projects must incorporate code-required defensible space (i.e., FMZs), ignition-resistant construction, sufficient water supply for firefighting, and proper emergency vehicle access in compliance with state and local requirements. In addition, the Project's annual fuel modification inspections (per MM-4.20-3), homeowner education programs (per MM-4.20-1), and enhanced building protections where FMZs are under 100 feet (per MM-4.20-2) further reduce the possibility of uncontrolled fire spread. Evacuation modeling has shown that, conservatively assuming 100% occupancy, and even with increased population, existing residents and future residents of the Project could still evacuate within a reasonable timeframe (89 minutes) if needed. It was determined it would take 1 hour and 3 minutes to evacuate surrounding land uses with existing conditions plus Cumulative Projects and 1 hour and 40 minutes to evacuate surrounding land uses with existing conditions plus Cumulative Projects plus the Project, an increase of 37 minutes for the surrounding land uses when compared to the cumulative without Project conditions. It would take 1 hour and 43 minutes to evacuate the Project site with existing conditions plus Cumulative Projects. However, the analysis is conservative, as it does not consider any phased evacuation, traffic control measures, or altering of evacuation routes, and assumes that all nearby residents and hotel patrons would be home and evacuating at the same time, with no sheltering-in-place. As such, the Project substantially conforms with the 90-minute timeframe established by FEMA. Thus, while cumulatively, more people would reside in fire-prone areas, adherence to robust fire and building codes, plus the Project's targeted mitigation measures for both construction and operation, ensures that wildfire risk would not be substantially exacerbated and that potentially significant cumulative impacts would be reduced to less than significant with mitigation. (DEIR, pp. 4.20-54 through 4.20-62.)

Mitigation Measures:

MM-4.17-1 Construction Traffic Management Plan. (See Transportation header under Section 3.)

MM-4.20-1 Wildfire Education Program.

MM-4.20-2 Alternative Materials and Methods.

MM-4.20-3 Annual Fuel Modification Zone Inspection.

MM-4.20-4 Construction Fire Prevention Plan.

MM-4.20-5 Construction-Related Fire Prevention Measures.

4 Findings Regarding Project Impacts Determined to be Significant and Unavoidable

Where, as a result of the environmental analysis of the Project, the County has determined that either (1) even with compliance with existing laws, codes and statutes, and/or the identification of feasible mitigation measures, potentially significant impacts cannot be reduced to a level of less than significant, or (2) no feasible mitigation measures or alternatives are available to mitigate the potentially significant impact, the County has found in accordance with PRC Section 21081(a)(3) and State CEQA Guidelines Section 15091(a)(3) that "Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report." This is referred to herein as "Findings 3."

4.1 Transportation

4.1.1 4.17b Conflict with CEQA Guidelines Section 15064.3, subdivision (b)

Impact 4.17b Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Finding: Significant and Unavoidable (DEIR, pp. 4.17-21 through 4.17-25.)

Facts in Support of Finding: The County's published guidelines identify a significance threshold for residential projects under Section 15064.3 of the State CEQA Guidelines: if the project's residential VMT per capita is not more than 16.8% below the existing residential VMT per capita for the entire County, the project would not have a significant VMT impact. According to the VMT Tool, the daily residential VMT per capita of the Project is estimated at 20.5. The significance threshold of 16.8% below the County baseline for 2022 is 10.6 residential VMT per capita (16.8% below 12.7) for the year 2022. Therefore, per the County's significance criterion for a direct impact, the Project's 20.5 residential VMT per capita exceeds the County's threshold and represents a potentially significant impact as estimated by the VMT Tool.

The Project's 20.5 daily household VMT per capita is higher than the threshold by 9.9 VMT per capita. In order to mitigate the residential VMT per capita impacts to less than significant, residential VMT per capita would need to be reduced by 48%. To reduce the Project's VMT, the Project includes compliance with regulatory requirements and site design elements for pedestrian network improvements that would be expected to enhance the usage of walking, biking, and accessing transit modes as alternatives to automobiles. In addition. a Transportation Demand Management (TDM) program is required, as mandated by MM-4.17-2. Implementation of MM-4.17-2 is estimated to result in a 7.45% reduction in VMT at a plan/community scale from 20.5 to 19.0 under 2022 Project conditions, which still exceeds the significance threshold of 10.6 VMT per capita. To fully mitigate the remaining VMT impact, the Project would need to implement additional TDM measures to achieve an additional 44% reduction in VMT. While this would likely exceed the California Air Pollution Control Officers Association subsector maximum reduction and not be feasible,

other potential supplemental mitigation measures were evaluated. One example is the LA Metro Universal College Student Transit Pass (U-Pass) program. The U-Pass program has the potential of reducing VMT by providing a low-cost transit option for college students in the County. The VMT Mitigation Program Pilot Project identified the nexus between daily VMT reduction, number of student transit passes, and mitigation cost. Although the U-Pass program can be a potential mitigation measure for certain projects in the County where participation in the U-Pass program could potentially reduce VMT, there is no nexus at the Project site, as there are no schools that participate in the U-Pass program proximate to the Project site. Additionally, there are no schools in Santa Clarita Valley that participate in the program, with the vast majority of schools participating in the program located geographically far away in central or south Los Angeles County. In addition, none of the bus/transportation providers with routes that provide service in the study area have a partnership with the U-Pass program. Santa Clarita Valley Transit Authority does not participate in the program. As there is no connection between a potential reduction of Project VMT and Project participation in the U-Pass program, there is no nexus between this potential mitigation measure and any reduction in a Project impact on transportation. Therefore, the U-Pass program is not feasible for the Project. Additionally, the nearest local service to the Project site is 0.6 miles north of the Project site. As such, there is currently no bus service that stops at the Project site along The Old Road. The Project would not preclude placement of a bus stop along The Old Road in the event that bus services are extended to the Project site.

Therefore, no combination of feasible mitigation measures would reduce the impact below the County's threshold of significance. Therefore, even with implementation of MM-4.17-2, the Project's VMT impact would remain significant and unavoidable, and the Project would conflict with CEQA Guidelines section 15064.3, subdivision (b). (DEIR, pp. 4.17-21 through 4.17-25.)

Mitigation Measures:

MM-4.17-2 Traffic Demand Management (TDM) Plan. (See Transportation header under Section 3.)

5 Findings Regarding Alternatives

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. PRC Section 21002 states, in part: "it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects." In addition, PRC Section 21002.1(a) states: "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

CEQA Guidelines Section 15126.6(b) emphasizes the selection of project alternatives should be based primarily on the ability to avoid or substantially lessen significant impacts attributable to a proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly." CEQA Guidelines Section 15126.6(f) further directs that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible.

CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative and CEQA Guidelines Section 15126.6(f)(2) requires the evaluation of alternative location(s) for a proposed project, if feasible. Based on the alternatives analysis, CEQA Guidelines Section 15126.6(e)(2) requires an EIR to designate an environmentally superior alternative. If the environmentally superior alternative is the No Project Alternative, then the EIR must identify an environmentally superior alternative among the other alternatives.

As required by the CEQA Guidelines Section 15124, the Project's specific objectives are 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.
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.
3. 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.
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.
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 consideration of alternatives is an integral component of the CEQA process. The selection and evaluation of a reasonable range of alternatives provides the public and decision-makers with information on ways to avoid or lessen environmental impacts created by a proposed project. When selecting alternatives for evaluation, CEQA

requires alternatives that meet most of the basic objectives of the Project, while avoiding or substantially lessening the Project's significant effects.

Alternatives Considered but Rejected from Detailed Analysis

CEQA Guidelines Section 15126.6(c) specifies that an EIR identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. With regard to feasibility, Section 15126.6(f)(1) states, "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plan or regulatory limitations, jurisdictional boundaries, and whether the applicant can reasonably acquire, control, or otherwise have access to the alternative site."

The following alternatives were considered but rejected as part of the environmental analysis for the Project:

- Alternative Site (DEIR, pp. 6-24 through 6-25.)
- Previously Approved Site – Lyons Canyon Ranch Project (DEIR, pp. pp. 6-29 through 6-32.)
- Elimination of VMT Significant and Unavoidable Impact (DEIR, pp. 6-25 through 6-29.)

Alternative Site: The County evaluated alternative locations consistent with CEQA Guidelines Section 15126.6(f)(2), focusing on whether any significant impacts—particularly the Project's significant and unavoidable VMT impact—could be avoided or reduced by relocating the proposed development. Though the Project's cumulative VMT impact would be less than significant with mitigation, its baseline VMT impact under Threshold 4.17b would likely remain similar elsewhere in northern Los Angeles County, such as the Santa Clarita Valley, due to comparable suburban conditions. More metropolitan areas like Downtown Los Angeles cannot accommodate the Project's physical size or objectives given existing development patterns. The Applicant, working with a licensed broker, then investigated whether a 233-acre site meeting proximity, infrastructure, and land-use needs existed in the Santa Clarita Valley, but none was available. Because the area is largely built out or set aside for conservation, and suitable properties are either developed, publicly owned, or pending development, no feasible alternative site is available. Therefore, the alternative site option was deemed infeasible and eliminated from further consideration.

Elimination of VMT Significant and Unavoidable Impact: The Project's only significant and unavoidable impact arises from its projected VMT under baseline conditions which would not be reduced to a less than significant level even with implementation of a TDM program (per MM-4.17-2). In exploring how to eliminate this VMT impact, several alternative development scenarios were considered based on Los Angeles County Public Works Transportation Impact Analysis Guidelines and a preliminary VMT sensitivity analysis. These included (1) a 100% affordable housing project, which would technically qualify for a less than significant VMT finding under County guidelines but would not meaningfully reduce actual VMT due to limited transit options near the Project site, and (2) various low-intensity land uses (e.g., small retail, office, warehouse, or light industrial) that would generate fewer than 110 daily vehicle trips. However, none of these scenarios would meet most of the Project's key objectives, particularly its need to develop a certain scale of residential uses while preserving open space. For the first scenario, while a fully-affordable housing development would reduce the impact to less than significant, as the Project site is not located within a Transit Priority Area due to the limited transit options nearby, future residents would likely still require use of single-occupancy vehicles. Therefore, without a robust transit network to support future lower-income residents under a 100% affordable housing project, comparable driving patterns to the proposed Project would occur and

there would not be a substantial reduction of environmental impacts related to VMT under this alternative scenario. As such, while the Project already exceeds the County's inclusionary housing requirements by providing 71 deed-restricted units (14% of total), neither a fully affordable housing development nor the alternative low-intensity land use scenarios would eliminate the significant VMT impact and satisfy the Project's objectives. Consequently, the considered scenarios were determined infeasible and eliminated from further consideration.

Previously Approved Project—Lyons Canyon Ranch Project: An EIR (State Clearinghouse No. 2003031086) was certified in August 2009 for the Lyons Canyon Ranch Project referred to as the "Previously Approved Project") located at the same Project site. The Previously Approved Project included 93 single-family detached residential units, 93 senior units, approximately 129 acres of natural open space lots, and 1.39 acres of recreation lots. An additional 46.67 acres would remain as disturbed open space (i.e., graded cut and fill-slope areas, recreation areas, detention/debris basin lots, and on-site trails), for a total of approximately 170 acres of total on-site disturbed/undisturbed open space.

Since adoption of the EIR for the Previously Approved Project, transportation analyses for CEQA shifted from a traffic analysis to an analysis of transportation impacts using VMT metrics instead of level of service (LOS), which was previously the metric used for CEQA traffic analyses. As such, the EIR for the Previously Approved Project did not include a VMT analysis pursuant to the current State CEQA Guidelines. As discussed in Appendix J to the DEIR, the County's VMT tool was used to determine the estimated VMT for the Previously Approved Project, assuming the same parameters used in the VMT analysis in the transportation impact analysis prepared for the Project. The Previously Approved Project would result in 20.4 Residential VMT per capita prior to mitigation, which would be 0.1 residential VMT per capita less than the Project. This 0.1 residential VMT reduction does not represent a meaningful reduction in VMT impacts and would still result in a significant and unavoidable impact when compared to the 10.6 residential VMT per capita threshold as used for the Project.

Additionally, even assuming the same percent reduction of VMT from MM-4.17-2 that was deducted from the Project (7.45% reduction, per TDM measures), the Previously Approved Project would result in 19.1 residential VMT per capita. Therefore, even with mitigation, the Previously Approved Project would still exceed the 10.6 residential VMT per capita threshold and would therefore also result in a significant and unavoidable impact regarding inconsistency with Section 15064.3(b) of the CEQA Guidelines. The residential VMT of the Previously Approved Project would result in comparable impacts to the Project, due to the location of the Project site and its surrounding land uses; the Project site is situated within a suburban area with predominantly single-family housing with limited trip destinations and transit options nearby. As the Project's significant and unavoidable impact would not be reduced under the Previously Approved Project, the Previously Approved Project is considered and eliminated from further analysis within the DEIR.

In addition, the EIR for the Previously Approved Project determined that the following topical areas would result in significant and unavoidable impacts: Aesthetics/Visual Resources; Air Quality; Biological Resources; Geology, Soils, and Seismicity; Noise; Sheriff Services; and Solid Waste. Therefore, the Previously Approved Project would result in more significant and unavoidable impacts than the Project.

At the time that the Project Applicant filed an application for this Project, the TTM for the Previously Approved Project had not yet expired, and as such, it was possible to implement the Previously Approved Project at that time in lieu of implementing the proposed Project. However, since then, the TTM for the Previously Approved Project has expired, and as such, the Previously Approved Project can no longer be constructed. Additionally, because the Project's significant and unavoidable impact would not be reduced or eliminated with implementation of the

Previously Approved Project, and because the Previously Approved Project would result in more significant and unavoidable impacts than the Project, the Previously Approved Project alternative was ultimately rejected from further analysis in the EIR.

Finding: The Regional Planning Commission rejects the Alternative Site, Previously Approved Site – Lyons Canyon Ranch Project, and Elimination of VMT Significant and Unavoidable Impact alternatives, on the following grounds, each of which individually provides sufficient justification for rejection of these alternatives: (1) the alternatives do not avoid the VMT significant and unavoidable impact, (2) the alternatives would likely not further reduce any of the proposed Project's other significant impacts; (3) the alternatives are technically, financially, and legally infeasible given that there is no available alternative site that could accommodate a project of this size; and (5) the alternatives would not meet the Project objectives. The State CEQA Guidelines require that "an EIR must identify ways to mitigate or avoid the significant effects a project may have on the environment." (State CEQA Guidelines Section 15126.6(b)). The Guidelines do not specify that only significant and unavoidable impacts are required to be mitigated or avoided but rather, any significant impact. The analysis of the alternatives considered but eliminated from further review narrows its review to the Project's significant and unavoidable VMT impact. Therefore, these alternatives are eliminated from further consideration. (DEIR, pp. 6-24 through 6-32.)

Alternatives Selected for Further Analysis

Three alternatives to the Project were defined and analyzed:

5.1 Alternative A: No Project/No Development

Description: Under CEQA Guidelines Section 15126.6(e), the no project alternative for a project on an identifiable property consists of the circumstance under which a proposed project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative A, the No Project/No Development alternative, assumes the Project would not be approved, no new permanent development or land uses would be introduced within the Project site, and the existing environment would be maintained. The Project site is currently undeveloped with no habitable structures or paved roads on-site; however, miscellaneous structures on the Project site include fencing, a metal frame bridge, a billboard, an abandoned water tank, water wells, metal drainage pipe, irrigation lines, non-dedicated trails, electrical distribution lines, dirt roads, and an abandoned and plugged oil well and no on-site landscaping improvements or pedestrian connections would occur. Additionally, all on-site trees would be preserved under this alternative. Under Alternative A, the potential Project-related impacts associated with development of the Project site and described in the DEIR would not occur. (DEIR, pp. 6-33 through 6-34.)

Impacts: Alternative A would not result in the addition of any residential units or other development on the Project site. Impacts related to aesthetics, agriculture/forest, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, tribal cultural resources, utilities and services systems, and wildfire would be reduced when compared to the Project. Impacts related to mineral resources and recreation would be the same as the Project. Alternative A would not result in any fuel modification that would otherwise be associated with the Project. Implementation of Alternative A would avoid the Project's significant and unavoidable transportation (VMT) impact and other significant impacts associated with construction and operational activities. (DEIR, pp. 6-33 through 6-43.)

Attainment of Project Objectives: While overall impacts would be reduced under Alternative A, this Alternative would not provide market-rate, very low-, middle-, and moderate-income housing opportunities, including senior housing and would not provide a comprehensive trail network (including publicly accessible trailhead). This alternative would not meet any of the Project objectives. (DEIR, pp. 6-34 through 6-35.)

Finding: Alternative 1 is hereby rejected by the Regional Planning Commission, on the following grounds, each of which provides sufficient justification for rejection of this alternative: (1) Alternative A would not achieve any of the Project objectives; and (2) Alternative A would result in increased impacts to recreation.

5.2 Alternative B: Mixed Use Project

Description: Alternative B would include 361 townhomes/attached rental dwelling units, 49,000 square feet of retail uses, a recreational center, on-site trails, and the same overall development footprint and natural open space as assumed for the Project. Alternative B development would be situated in the northeastern portion of the Project site. Overall, the development footprint would be approximately 83 acres, and total preserved open space would be approximately 150 acres. The 49,000 square feet of retail uses would be situated on land currently zoned "C-3-DP" (Unlimited Commercial – Development Program) and consist of uses such as a shopping center, restaurants, and other related retail uses and would include associated surface parking. Project infrastructure would include internal roadways, trails and a new trailhead, a new water tank, and seven Los Angeles County Flood Control District lots with debris and desilting basins, consistent with the Project. Comparable off-site improvements to the Project would also be necessary for Alternative B. (DEIR, pp. 6-43 through 6-44.)

Impacts: Impacts related to agriculture/forest, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, recreation, tribal cultural resources, utilities and services systems, and wildfire would be similar when compared to the Project.

Impacts to aesthetics would be greater than the Project. The signage and lighting associated with Alternative B's retail uses would be brighter than those associated with residential uses. This lighting could be visible from nearby off-site trails, I-5 (an eligible scenic highway), and other public views into the site. However, it is likely that due to the location of the retail uses (internal to the Project site), light and glare impacts would remain less than significant under Alternative B.

Regarding noise impacts, the proposed retail uses under Alternative B would be located proximate to existing off-site residences north of the Project site, as near as 350 feet from existing residential uses. Therefore, the retail uses associated with Alternative B would likely result in higher operational noise levels than those assumed for residential uses, additional mitigation would be required to reduce permanent increases in ambient noise levels in the vicinity of the Project site to less than significant. Overall, Alternative B would result in greater noise impacts than the Project.

Regarding population and housing impacts, Alternative B would result in increased employment when compared to the Project due to the retail component of Alternative B. Alternative B would result in a nominal contribution to the Project site vicinity's employment growth projections. Therefore, employment impacts under Alternative B would be slightly greater than the Project, but would remain a less than significant impact.

Regarding impacts to public services, all Project mitigation measures necessary to reduce potential construction impacts related to public services would also be required under Alternative B, and as such, construction impacts under Alternative B would be consistent with the Project. Operationally, while the introduction of commercial uses may increase the demand for fire and sheriff services to the Project site due to increased employees and visitors which could require said services, Alternative B would result in less residential uses, which would result in reduced demand for said services. As such, Alternative B would result in comparable fire and sheriff protection needs and impacts to the Project. Alternative B would result in slightly less school-aged residents than the Project due to the reduced unit count when compared to the Project. Similar to the Project, Alternative B pay required school districts' development impact fees to ensure that impacts to service capacities of schools would be less than significant. Alternative B would not be anticipated to create capacity or service level problems relative to parks, and it is anticipated that such impacts would be less than significant for Alternative B. As with the Project, Alternative B would be required to pay a Library Facilities Mitigation Fee payment to ensure the impact on the library system would be less than significant. Overall, impacts under Alternative B would be less than the Project.

Regarding transportation impacts, Alternative B would include mixed uses and is expected to generate 4.2% fewer vehicle trips with the mixed-use program than trips generated from each individual land use in isolation. Alternative B would result in a 16.3 Residential VMT per capita without mitigation, compared to the Project's 20.5 Residential VMT per Capita without mitigation. Alternative B would result in 15.2 Residential VMT per capita with mitigation compared to the Project's 19.2 Residential VMT per capita with mitigation. As such, Alternative B would also exceed the County's threshold and even with mitigation would therefore also result in a significant and unavoidable impact. Therefore, Alternative B would generally reduce the magnitude of impacts related to baseline residential VMT per capita but would not eliminate the significant and unavoidable impact.

Attainment of Project Objectives: Alternative B would meet or partially satisfy all of the Project objectives except for Objective 4: "Provide substantial homeownership opportunities for middle-income families in an area proximate to existing residential uses and infrastructure." Alternative B would not provide substantial homeownership opportunities for middle-income families, as all dwelling units in Alternative B would be rental units.

Finding: Alternative B is hereby rejected by the Regional Planning Commission, on the following grounds, each of which provides sufficient justification for rejection of this alternative: (1) Alternative B would only partially satisfy all of the Project objectives; (2) Alternative B fails to avoid the Project's significant and unavoidable VMT impact; and (3) Alternative A would result in increased impacts to aesthetics, noise, and population/housing.

5.3 Alternative C: Reduced Footprint Alternative

Description: Alternative C would include 510 multi-family dwelling units in mid-rise apartment complexes and a recreational center. All 510 units would be rental units. This alternative would include avoidance of most riparian habitat and non-riparian streams, and substantial avoidance of other biological resources, including native habitats, protected trees, oak woodlands, special-status plants, and rare plants. Most development would be concentrated within the northeastern corner of the Project site, on approximately 28 acres, except for the siting of a water tank located west of the development footprint proposed for Alternative C. The approximately 28-acres of development represents a 67% reduction in the development footprint when compared to the Project. Therefore, the remaining approximately 205 acres would be included as natural open space within the southwestern portion of the site. No private maintenance road, and no publicly-accessible trailhead is included within Alternative C. For the 28-acre development footprint, Alternative C would require a zone change to R-3, Limited Density Multiple Residential, which would allow apartment/multi-family units

without condition, and a General Plan Amendment to H18 (allow 9 to 18 units/acre). The remaining portion of the Project site would keep the existing zoning and land use of A-2-2 and H2, respectively.

Impacts: Alternative C would result in similar impacts as those of the Project and would require the same mitigation as the Project (if needed) in the following topic areas: aesthetics; agriculture/forest; air quality; mineral resources; population and housing; and transportation. Alternative C would result in increased impacts to public services and recreation. The same mitigation measures applicable to the Project would be required under Alternative C to reduce potential impacts. However, Alternative C would reduce some mitigation requirements related to air quality, biological resources, GHG emissions, hazards, and noise. Alternative C would not reduce impacts to cultural resources or tribal cultural resources, wildfire, or transportation or eliminate the significant unavoidable impact related to baseline residential VMT per capita. Impacts related to biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, tribal cultural resources, utilities and service systems, and wildfire would be reduced when compared to the Project.

Regarding air quality impacts, during construction, it is possible that offroad-equipment-specific mitigation would not be required for Alternative C due to the reduced footprint; however, the increased soil export off-site under Alternative C would increase truck-related emissions, which would result in higher construction-related emissions, which could require truck-related mitigation (of which the Project does not have) to reduce impacts to less than significant. Therefore, it is anticipated that Alternative C construction impacts would be greater than the Project. However, during operations, it is likely that Alternative C would result in comparable magnitude of emissions as the unit count would remain the same under the alternative when compared to the Project. Thus, overall, air quality impacts under Alternative C would be similar to the Project.

Regarding biological resources, mitigation would still be applicable to Alternative C to reduce impacts to biological resources to less than significant. However, the specific restoration and/or replacement requirements would be proportionally reduced for direct impacts due to the reduced development footprint under Alternative C. Overall, impacts to biological resources under Alternative C would be less than the Project.

Regarding GHG emissions, Alternative C would generate slightly less GHG emissions than the Project, because dwelling units would have reduced square footage when compared to the Project, and therefore, overall energy consumption and mobile emissions would likely be less under Alternative C, due to the change in housing type from a mix of housing under the Project to all multi-family apartments under Alternative C. However, in order to reduce direct or indirect GHG emissions from Alternative C, it is likely that almost all mitigation measures under the Project would also be required to reduce impacts under Alternative C due to the similarity of uses on-site and magnitude of emissions for the Project. Therefore, impacts under this alternative would be less than significant with mitigation, and reduced when compared to the Project.

Regarding hazards, the development footprint of Alternative C would be reduced, and thus, Alternative C would no longer require the development of structures on or within 300 feet of the abandoned and plugged oil-well on-site. Alternative C would not be required to implement mitigation related to well assessment and methane gas surveys and remediation on-site. Therefore, impacts from hazardous materials under Alternative C would be less than the Project.

Regarding land use, Alternative C would also be subject to the same mitigation measures as required to reduce impacts to less than significant for biological resources. However, the impacts to HMAs or SEAs would be less under Alternative C due to less site disturbance. Most mitigation measures applicable to land use and planning under the

Project would also be applicable under Alternative C; however, due to the reduced development footprint, is likely that Alternative C would eliminate or reduce some mitigation measure requirements related to air quality, biological resources, GHG emissions, and noise.

Regarding noise, the development footprint of Alternative C would be reduced and located farther south than the Project, and therefore, farther away from existing sensitive receptors. It is anticipated that mitigation may still be required to reduce temporary construction noise impacts to less than significant. However, the specific mitigation requirements may be reduced due to increased distance to existing off-site sensitive receptors. Therefore, impacts would be less than the Project.

Regarding impacts to public services, all Project mitigation measures necessary to reduce potential construction impacts would also be required under Alternative C. However, the natural open space on-site would not be made available to the public. As such, fewer recreational uses would be available for the residents to use on-site. As a result, recreation service-level impacts under Alternative C would be less than significant, consistent with the Project, but would be slightly greater than the Project.

Regarding impacts to recreation, the preserved natural open space on-site would not be made available to the public, and no publicly accessible trailhead would be provided on-site. This would also increase potential impacts related to physical deterioration of recreational facilities nearby. Therefore, impacts to recreation under Alternative C would be greater than the Project.

Regarding transportation, Alternative C would not result in a substantial change to VMT when compared to the Project, because the overall dwelling unit count would not change. As such, under Alternative C, the baseline residential VMT per capita would be similar to the Project and would remain significant and unavoidable.

Attainment of Project Objectives: Overall, this alternative would result in reduced environmental impacts compared to the Project. However, this alternative would not satisfy Project Objective 4 to provide homeownership opportunities, nor Project Objective 6 to provide a comprehensive trail network. Alternative C would not provide substantial homeownership opportunities for middle-income families, as all dwelling units in Alternative C would be rental units (Project Objective 4). Furthermore, due to site constraints and the smaller development footprint under Alternative C, Alternative C would not include a publicly accessible trailhead or provide a comprehensive on-site trail network; therefore, there would not be publicly accessible connections to off-site dedicated trails (Project Objective 6). The alternative would satisfy or partially satisfy the remaining Project Objectives.

Finding: Alternative C is hereby rejected by the Regional Planning Commission, on the following grounds, each of which provides sufficient justification for rejection of this alternative: (1) Alternative C would only partially satisfy the Project objectives; (2) Alternative C fails to avoid the Project's significant and unavoidable VMT impact; and (3) Alternative C would result in increased impacts to public services and noise.

5.4 Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed Project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. Based on the alternatives analysis contained within the DEIR, the Alternative A, No Project/No Development, would avoid all construction and operational impacts (with the exception of recreation impacts related to regional trail connectivity) but would not meet any of the primary Project objectives.

As required by CEQA Guidelines Section 15126.6, because the Environmental Superior Alternative is the No Project Alternative (No Project/No Development), an Environmentally Superior Alternative must be selected from the remaining alternatives. Because Alternative C would reduce some mitigation requirements related to air quality, biological resources, GHG emissions, hazards, and noise, and would reduce the footprint of development when compared to both the Project and Alternative B, Alternative C would be the environmentally superior alternative. As summarized in Table 6-3, Comparison of Project and Alternatives Impacts, of the DEIR (DEIR, pp. 6-72 through 6-73), Alternative C would result in reductions in impacts related to biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, tribal cultural resources, utilities and service systems, and wildfire when compared to the Project. Although Alternative C would not meet all of the Project Objectives since this alternative would not provide substantial homeownership opportunities for middle-income families or provide a comprehensive trail network and, this alternative would not eliminate the significant unavoidable impact related to baseline residential VMT per capita, Alternative C represents further reductions when compared to Alternative B.

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6 Findings Regarding Significant Irreversible Environmental Changes

Sections 15126(c) and 15126.2(c) of the CEQA Guidelines, require that an EIR address any significant irreversible environmental changes that would occur should the project be implemented. Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The project would involve a large commitment of non-renewable resources;
- The primary and secondary impacts of the project would generally commit future generations to similar uses;
- The project involves uses in which irreversible damage could result from any potential environmental accidents; or
- The proposed consumption of resources is not justified.

Large Commitment of Non-Renewable Resources. The Project would consume limited, slowly renewable, and nonrenewable resources; however, the amount and rate of consumption of these resources would not result in significant environmental impacts related to the unnecessary, inefficient, or wasteful use of resources. Water use during Project construction would be limited to minor amounts of water required for various uses, such as dust suppression. Water use would be minor to negligible when compared to the operational demands of the Project, as well as the operational demands of the land uses to the north and east of I-5. With regard to building materials, the Project would be constructed with durable materials with a significant lifespan, such as cast in place concrete and precast concrete, which would improve building longevity. As such, even though construction would result in the commitment of building materials, the materials are not expected to require replacement during the Project's estimated operational lifespan. Furthermore, Sections 4.408 and 5.408 (Construction Waste Reduction, Disposal and Recycling) of CALGreen (CCR Title 24, Part 11), require that 65% of all demolition and construction materials must be recycled, as demonstrated in an approved construction waste management plan. These regulations would ensure that portions of the existing materials on site are recycled or reused. In the event that the Project uses were to be demolished at a future time, these regulations would ensure that a majority of the materials are recycled. In addition, construction activities related to the reasonably expected development would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment. However, use of such resources would not be unusual as compared to other construction projects and would not substantially affect the availability of such resources.

With respect to operational activities, water and non-renewable energy resources (such as petroleum) would be committed for heating and cooling of buildings, lighting, and transportation. However, compliance with applicable building codes such as the California Building Standards Code (CCR Title 24), inclusive of CALGreen and the California Energy Code (CCR Part 6 Title 24), and Title 31 (Green Building Standards Code) of the Los Angeles County Code (County Code), as well as required mitigation measures discussed in Chapter 4 of the DEIR, would ensure that natural resources are conserved or recycled to the maximum extent feasible. The Project would be designed to include numerous energy-saving features that would allow the Project to comply with energy conservation standards found in the CALGreen Code. Implementation of MM-4.8-3, Energy Conservation, details energy conservation measures, such as installation of Energy-Star-related heating, cooling, lighting, and appliances, installation of a 7-kilowatt (kW) solar photovoltaic electric generating system at the recreation center, installation of cool pavement, and light emitting diodes or other high-efficiency lightbulbs outdoors.

Mitigation measures required in the DEIR, Section 4.8, Greenhouse Gas Emissions, would change the energy demand profile of the Project by eliminating natural gas in residential development (MM-4.8-2, Electrify Buildings) and replacing that energy demand with electricity. In addition, the Project's operational petroleum consumption is anticipated to be reduced as a result of MM-4.8-5 (Encourage Electric Vehicles), which requires installation of electric vehicle (EV) chargers. Greater use of EVs and elimination of natural gas would result in a greater consumption of electricity; however, electricity would partially be provided through on-site solar, thereby reducing the use of fossil-fuel for residential or recreational uses on-site. Per MM-4.8-4 (Utilize 100% Zero-Carbon Electricity), the Project uses would be required to use 100% zero-carbon electricity procured through an electricity provider for the residences and recreational center. The CALGreen Code requires all new low-rise residential buildings to install photovoltaic panels that can generate an output greater than or equal to the amount of electricity that a home would consume in one year. In accordance with CALGreen, the Project would have mandatory inspections of energy systems to ensure optimal working efficiency and would use low pollutant-emitting exterior and interior finish materials.

In addition to applicable code and mitigation requirements, it is also likely that in response to GHG emissions reduction plans (including the County's Community Climate Action Plan, the 2020-2045 RTP/SCS, and the California Air Resources Board Scoping Plan) new technologies or systems will emerge, or will become more cost-effective or user-friendly, that will further reduce the Project's operational reliance on nonrenewable natural resources. However, even with implementation of conservation measures, consumption of natural resources would generally increase with implementation of the Project due to population and activity increases. Although the Project would see an increase in petroleum use during construction and operation, it is anticipated in the future vehicles would use less petroleum due to advances in fuel economy.

The Project's water use is discussed in detail in Section 4.19 of the DEIR, which concluded that the Project would require approximately 215 AF per year in an average/normal year during operation. The Project would implement water conservation practices that would reduce both indoor and outdoor irrigation demands, including landscaping designed in accordance with the Model Water Efficient Landscape Ordinance standards (CCR Title 23, Division 2, Chapter 2.7). Additionally, as required with implementation of MM-4.8-6, Water Use Efficiency and Water Conservation, the Project would include other water conservation measures, such as low-flow or high-efficiency water fixtures, high -efficiency appliances to reduce water use, and drought-tolerant plantings. Further, as indicated by SCV Water in their Project specific WSA, the projected water supplies available to the SCV Water service area are sufficient to meet the projected demands associated with Project, in addition to existing and other planned future uses, including agricultural and industrial uses, throughout the Santa Clarita Valley.

In addition to the above considerations, State and local laws and regulations would further reduce the Project's use of nonrenewable resources over time. Specifically, electricity consumed at the Project site would be increasingly sourced from renewable energy, pursuant to Senate Bill 100. SB 100, which passed in 2018, states that 44% of the total electricity sold to retail customers in California per year must be secured from qualifying renewable energy sources by December 31, 2024, 52% by December 31, 2027, and 60% by December 31, 2030. SB 100 also sets forth a State policy that eligible renewable energy resources and zero-carbon resources supply 100% of the retail sales of electricity to California and requires that achieving 100% zero-carbon electricity does not increase carbon emissions elsewhere in the western grid or is not fulfilled through resource shuffling. As such, the Project's consumption of nonrenewable energy is anticipated to significantly decrease over time, as SB 100 is implemented statewide and overall nonrenewable energy consumption decreases.

Similarly, vehicles that would travel to and from the Project site would be subject to increasingly stringent emissions standards over time, which would reduce the amount of fossil fuel consumed per vehicle. Furthermore, the County and

State have policies in place to support decreased use of personal vehicles and reduce the total vehicle miles traveled. As such policies are carried out, the number of vehicles traveling to and from the site may decrease over time.

In summary, implementation of the Project would involve irreversible environmental changes to existing natural resources, such as the commitment of non-renewable energy and water resources as a result of the operation and maintenance of the Project. However, implementation of Project would not involve wasteful or unjustifiable use of energy or other resources, and energy conservation efforts would be mandated as part of new construction. The Project would be constructed and operated in accordance with specifications contained in CALGreen, the California Energy Code, and the County Code. Therefore, the use of energy related to the Project would occur in an efficient manner. (DEIR, pp. 5-3 through 5-5.)

Commitment to Future Uses. Implementation of the Project would require and facilitate the use/consumption of water and non-renewable resources (e.g., natural gas, petroleum-based fuels). The Project would develop a mix of residential uses (including affordable senior housing), recreational facilities, and other utilities/ancillary uses on an undeveloped site, thus facilitating consumption of resources where resources are not currently being consumed and, by converting the Project site from open space to the proposed uses, committing future generations to similar uses. While the Project proposes improvements along The Old Road and new, internal roads to support emergency access, on-site circulation, and ingress/egress to The Old Road, the Project would not construct new roads which provide access to previously inaccessible areas thus committing future generations to similar uses.

While the primary impacts of the Project would result in commitment of future generations of people to similar uses, the commitment to resources would be justified and in accordance with planned growth for the region pursuant to General Plan land use designation for the site and other applicable regional projections. (DEIR, p. 5-5.)

Irreversible Damage from Environmental Accidents. Given compliance with all proposed State and County requirements and measures related to the on-site plugged oil well and land management within a VHFHSZ and HMA, including an approved Fuel Modification Plan, Fire Protection Plan, Geotechnical Report, Phase I Environmental Site Assessment, and with implementation of required mitigation, the Project would not create significant impacts due to the transport, use or handling of hazardous materials or the potential for wildfire. The Project would be constructed in compliance with the most recently adopted State and County fire and building codes. The former oil well would be remediated and re-abandoned consistent with these requirements. The Project's Approved Fuel Modification Plan would minimize potential wildland fire risk by requiring adequate FMZs for development within a VHFHSZ. The Project would incorporate infrastructure to ensure fire safety, including a new water tank to assure reliable fire flow water pressure is available in the event of a wildfire for the new residential structures, fire hydrants, and an emergency access road are provided. Development of the proposed on-site buildings would be required to comply with Chapter 7 of the CFC (as adopted and amended by Title 32, Fire Code, of the County Code), which requires the use of ignition resistant building materials, smoke barriers, sprinkler systems, fire protection systems, and door and window designs to avoid ember intrusion. The Project's Wildfire Evacuation Plan determined that in the event of a wildfire future Project residents and nearby existing developed areas would be able to evacuate using local evacuation routes. The Project's Homeowners' Association would provide emergency preparedness resources to support situational awareness and household preparedness and be responsible for educating Project occupants about the local wildfire risks and the County's "Ready!, Set!, Go!" model of evacuation that encourages early evacuation of residents.

In addition, operation of the Project would only require limited use of commercially available hazardous materials, including household/janitorial and landscaping products. Should the amount of on-site hazardous materials,

including hazardous wastes, be greater than reporting thresholds (55 gallons of liquid, 500 pounds of solid, or 200 cubic feet of compressed gas), a Hazardous Material Business Plan would be required under California Health and Safety Code Division 20, Chapter 6.11, Sections 25404–25404.9. The Hazardous Material Business Plan, which would be submitted to the Los Angeles County Fire Department (the local Certified Unified Program Agency) via the California Environmental Reporting System, would include emergency and spill prevention and response measures, thereby reducing the potential for an upset or accident condition. Use of extremely hazardous materials and accumulation of acutely hazardous wastes are not anticipated. Thus, with compliance with applicable State and County requirements and implementation of the mitigation measures discussed in the DEIR, the Project would not increase potential wildland fire or other hazards, or create indirect oil well effects on the Project site that would pose a threat to the area's existing and future Project occupants. Project operational impacts are not anticipated to result in irreversible damage due to environmental accidents. (DEIR, pp. 5-5 through 5-6.)

Consumption of Resources Justified. While the Project would increase resource consumption during construction and operation, according to the SCAG 2020-2045 RTP/SCS, the demand for slowly renewable and nonrenewable resources is expected to increase in the region regardless of whether the Project is developed. The 2020-2045 RTP/SCS indicates that the population and employees in the unincorporated County is estimated to increase by 20% and 19%, respectively, by 2045 over base-year 2016 (SCAG 2020). These increases will directly result in the need for more housing and services to accommodate the anticipated growth. If not consumed by this Project, slowly renewable and nonrenewable resources would likely be committed to other projects in the region intended to meet this anticipated growth. Furthermore, the investment of resources in the Project would be typical of the level of investment normally required for a project of this scale.

The Project would not exceed SCAG's or the County's General Plan population, housing, or employment growth projections for the unincorporated County area or Santa Clarita Valley Planning Area, respectively. The Project would help the County achieve its regional housing needs consistent with the County's Housing Element Update and the Regional Housing Needs Assessments' (RHNA's) 6th Cycle determination for the unincorporated County. Therefore, the Project's proposed development—and resulting commitment to future uses—would be in support of planned growth for the County and Santa Clarita Valley Planning Area and would provide much-needed housing to address the housing crisis in Southern California. Thus, while the Project's proposed uses would result in consumption of slowly renewable and non-renewable resources, these uses would be in support of planned growth for the region and would not result in future consumption of resources above and beyond what is necessary (per RHNA) or anticipated to occur (per the General Plan and 2020-2045 RTP/SCS). For these reasons, the irretrievable commitment of resources attributable to the Project would not be significant. (DEIR, pp. 5-6 through 5-7.)

7 Findings Regarding Growth-Inducing Impacts of the Project

Impact: The Project is directly and indirectly growth-inducing pursuant to CEQA (14 CCR 15126[e]).

Finding: The Project would not result in substantial direct or indirect growth-inducement.

Facts in Support of Finding: Operation. CEQA requires a discussion of ways in which a project could be growth inducing. The CEQA Guidelines identify a project as growth inducing if it fosters economic or population growth or results in the construction of additional housing, either directly or indirectly, in the surrounding environment (14 CCR 15126[e]). New population from residential development, such as this Project, represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. A project could indirectly induce growth by reducing or removing barriers to growth or by creating a condition that attracts additional population or new economic activity. However, a project's potential to induce growth does not automatically result in growth. Growth can only happen through capital investment in new economic opportunities by the private or public sectors.

Indirect growth-inducing impacts are commonly associated with the extension of new public services, utilities, and roads into areas that have previously been undeveloped. The extension of such infrastructure into a non-serviced area can represent the elimination of a growth-limiting factor, thereby inducing growth. Increases in the population may tax existing community service facilities, requiring construction of new facilities and ultimately resulting in an increase in the pace of development or the density of the existing surrounding development. Indirect growth-inducing impacts include an increased demand for housing, commodities, and services that new development causes or attracts by increasing the population or job growth in an area.

The Project would directly induce residential growth through the proposed residential development and employment growth through the proposed recreation center. Based on an average person per household rate of 3.5 (used in the County's Housing Element Update), the Project's 510 housing units would result in approximately 1,785 new residents.[3] The Project's proposed population growth would represent 1.33% of the anticipated population growth for the Santa Clarita Valley Planning Area in 2035. The Santa Clarita Valley Planning Area is expected to have an annual population growth of 5.83%, which far exceeds the annual growth rate anticipated for the County and the SCAG region.[4] As such, the Project's anticipated population growth of 1.33% is nominal and would not exceed the County's population growth projections for the Santa Clarita Valley Planning Area. Furthermore, at buildout, approximately 10 employees would be required to operate the Project's recreational center. The anticipated number of employees is conservatively estimated based on a ratio of 424 square feet per employee for the "Other Retail/Services" land use category.[5] The recreation center would include one building of approximately 4,540 square feet, including the following: a club room, fitness center, restrooms, conference room, study room, kitchen space, and entertainment/sitting areas. Thus, approximately 10 employees are anticipated. Based on the County's

3 County of Los Angeles. 2022. Revised County of Los Angeles Housing Element (2021-2029). https://planning.lacounty.gov/wp-content/uploads/2022/11/housing-element-20220517.pdf.

4 County of Los Angeles. 2014. Los Angeles County General Plan Update Draft Environmental Impact Report. State Clearinghouse No. 2011081042. Department of Regional Planning. June 2014. https://planning.lacounty.gov/wp-content/uploads/2022/11/gp_2035_deir.pdf.

5 Southern California Association of Governments. 2001. "Table 4A." In Employment Density Study Summary Report. Prepared by Natelson Company in association with Terry A. Hayes Associates. October 31, 2001.

General Plan projections, approximately 84,411 new employees (an annual employment growth of 17.87%) will be employed in the Santa Clarita Valley Planning Area by 2035.[6] Overall, the Project's 10 employees would result in a nominal contribution to the area's employment growth projections. Development of the Project site is consistent with allowable development under the County's General Plan and existing zoning. Therefore, the Project would not result in substantial direct growth inducement.

The Project would incorporate infrastructure to ensure fire safety, including a new water tank with up to two million gallons of water capacity to assure a reliable fire flow water pressure is available for the new residential structures on-site. Similarly, the Project would require various off-site water infrastructure improvements, including a new Zone Valve in The Old Road, construction of 4,000 linear feet of pipe in The Old Road, and upgrades to two existing pump stations east of I-5. However, these off-site improvements would be required specifically to accommodate the Project site, and therefore, would not result in direct or indirect growth-inducing impacts.

As detailed in the DEIR, the Project Applicant would pay the County's required Fire Facility Fee, which typically constitutes full mitigation for development impacts associated with the need for additional fire protection services or facilities. Further, the Project Applicant would provide an additional community benefit contribution in the amount of $2,000,000, to be used by LACoFD towards its purchase of firefighting equipment to further enhance the continued provision of fire protection services within its jurisdiction, including the Project area. This funding will be used for the County's procurement of two fire engines (Type 1 triple combination pumpers) including outfitting, equipment, and communication costs. Therefore, the Project would not result in substantial direct or indirect growth inducement.

In addition to the above benefits derived from the Project's stated objectives, 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 million 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).[7] 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. 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. The economic benefits would be much greater than those currently provided now as the Project site is vacant and undeveloped. Given this, the Project would not result in substantial direct or indirect growth inducement.

Regarding the Project site's location within unincorporated Los Angeles County, the Project site is adjacent to the City of Santa Clarita, with residential, limited commercial, and open space land uses. The Project site is south of Sagecrest Circle in the Stevenson Ranch community, adjacent to The Old Road to the east, and to residential and commercial uses to the north and east, and north of Calgrove Boulevard near Ed Davis Park in Towsley Canyon. The Project site is bordered by mountainous open space on its western boundary and parkland owned and maintained by the City of Santa Clarita and MRCA to the south and west, which would limit the potential for growth inducement. From the Project's private access road, the Project would provide an easement for secondary access on Lots 14, 22, and 24 to allow for potential future access from an off-site property, TTM 74979, located adjacent to the northwestern portion of the Project site. TTM 74979 is included as Cumulative Project LA2. Cumulative Project LA2 is considered inactive and the need for a future secondary access road to this site is uncertain. As such,

6 County of Los Angeles. 2014. Los Angeles County General Plan Update Draft Environmental Impact Report. State Clearinghouse No. 2011081042. Department of Regional Planning. June 2014. https://planning.lacounty.gov/wp-content/uploads/2022/11/gp_2035_deir.pdf.

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

implementation of this secondary access road is not reasonably foreseeable. The Project may facilitate access and connection to a potential future project, but the entitlement, design, and construction of a secondary access road within the easement would be the responsibility of the applicant for Cumulative Project LA2. Nonetheless, because the Project is allowing for a potential future connection to this adjacent property, this easement is considered a growth-inducing impact for Cumulative Project LA2, as it would remove an obstacle to growth by providing for a potential future secondary vehicular access that could allow for future development of TTM 74979. However, this growth-inducing impact would be limited to residential lots on Cumulative Project LA2 in an area bordered with residential uses to the north of the Project and TTM 74979, and as such, would not be considered adding substantial growth on a regional basis. Therefore, although the Project would result in growth inducing impacts due to removal of obstacles to the future development of TTM 74979, it would not facilitate development of TTM 74979, which would be subject to the County's land use plans, zoning restrictions, County Code, State laws and regulations, discretionary review, permitting, and environmental evaluation pursuant to CEQA. Therefore, the Project would not substantially contribute to indirect growth inducement.

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