

**CEQA FINDINGS OF FACT AND STATEMENT OF OVERRIDING
CONSIDERATIONS REGARDING THE FINAL SUPPLEMENTAL ENVIRONMENTAL
IMPACT REPORT FOR THE ENTRADA SOUTH AND VALENCIA COMMERCE
CENTER PROJECT**

STATE CLEARINGHOUSE NO. 2000011025

Exhibit A

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I. INTRODUCTION

The California Environmental Quality Act (CEQA, California Public Resources Code §§ 21000 et seq.) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code.

The Entrada South and Valencia Commerce Center (VCC) Project implements the development within the Entrada South and VCC Planning Areas facilitated by the approved Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP) approved by the California Department of Fish and Wildlife (CDFW), which was the subject of an EIR and Additional Environmental Analysis that was certified by CDFW in 2017 (State Clearinghouse [SCH] No. 2000011025; hereafter collectively referred to as the “State-certified EIR”), as described in Section III, below. For purposes of these findings, the “2017 Project” refers to the resource management activities and development facilitated by the RMDP/SCP as approved by CDFW in 2017 for the Entrada South and VCC Planning Areas.¹ The Entrada South and VCC Project as currently proposed reflects minor changes and refinements related to the development of the Entrada South and VCC Planning Areas, as compared to the 2017 Project. As such, the Entrada South and VCC Project is referred to herein as the “Modified Project.”

Consistent with the requirements for supplemental CEQA review, as described more in Section 3.1, below, the County of Los Angeles (County) analyzed potential environmental effects of the Modified Project in a Draft Supplemental EIR (SEIR) (SCH No. 2000011025) that focuses on the Modified Project’s incremental changes from the 2017 Project, as well as applicable changes in circumstances and new information since certification of the State-certified EIR by CDFW. The County prepared a Final SEIR that incorporates the Draft SEIR and contains the comments received on the Draft SEIR, responses to comments, revisions to the Draft SEIR including any clarifications based on the comments and the responses to the comments, and the Mitigation Monitoring and Reporting Program for the Modified Project (MMRP).

This document provides the findings required by CEQA for approval of the Modified Project (“Findings”).

A. Statutory Requirements for Findings

CEQA (Pub Res. Code §§ 21000, et seq.) and the State CEQA Guidelines (Guidelines) (14 Cal. Code Regs §§ 15000, et seq.) promulgated thereunder, require that the environmental

¹ VCC was originally approved for development by Los Angeles County through the issuance of various entitlements (including CUP 87-360) and certification of an EIR (SCH No. 1987-123005) in 1991, and the VCC Planning Area portion of VCC was subsequently analyzed in the State-certified EIR. The Entrada South Planning Area was referred to as the Entrada Planning Area in the State-certified EIR.

impacts of a project be examined before a project is approved. Specifically, regarding findings, Guidelines Section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - (1) Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the final EIR.
 - (2) 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 and should be adopted by such other agency.
 - (3) 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.
- (b) The findings required by subsection (a) shall be supported by substantial evidence in the record.
- (c) The finding in subsection (a) (2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subdivision (a) (3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
- (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.
- (e) The public agency shall specify the location and custodian of the documents or other materials which constitute the record of the proceedings upon which its decision is based.
- (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in Guidelines Section 15091(a)(1) above, that are required in, or incorporated into, the project which mitigate or avoid the significant

environmental effects of the project, may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

Where a prior EIR has been certified, supplemental CEQA analysis is only required in accordance with Guidelines Section 15162, which provides:

- (a) When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
 - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;

- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As it relates to an agency approving a project that has been reviewed using a Supplemental EIR, Guidelines Section 15163(e) provides:

- (e) When the agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15091 shall be made for each significant effect shown in the previous EIR as revised.

Regarding a Statement of Overriding Considerations, Guidelines Section 15093 provides:

- (a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal [sic] project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”
- (b) When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091.

These Findings constitute the County’s best efforts to set forth the evidentiary and policy bases for its decision to approve the Modified Project in a manner consistent with the requirements of CEQA.

In addition, a Mitigation Monitoring and Reporting Program has been prepared for the Modified Project and is being approved by the County by the same Resolution that has adopted these Findings. The County will use the Mitigation Monitoring and Reporting Program to track compliance with all applicable mitigation measures to the Modified Project as identified in the State-certified EIR as supplemented by the SEIR. The Mitigation Monitoring and Reporting Program will remain available for public review during the compliance period. The Final Mitigation Monitoring and Reporting Program is attached to and incorporated into the environmental document approval resolution and is approved in conjunction with certification of the SEIR and adoption of these Findings. The Mitigation Monitoring and Reporting Program will be binding on the Modified Project and enforceable by the County, in accordance with CEQA.

Having received, reviewed, and considered the Draft SEIR and the Final SEIR for the Modified Project, the Mitigation Monitoring and Reporting Program, and other information in the record of proceedings on this matter, the County in its capacity as the CEQA Lead Agency hereby finds, determines, and declares the following Findings, in accordance with Section 21081 of the Public Resources Code.

These Findings set forth the environmental basis for the discretionary actions to be undertaken by the County for the development of the Modified Project, as described further in Section 2, below.

B. Organization of Document

These Findings have been organized into the following sections:

- (a) Section 1 provides an introduction to these Findings.
- (b) Section 2 provides a summary of the Modified Project, overview of the discretionary actions required for the approval of the Modified Project, and a statement of the Modified Project's objectives.
- (c) Section 3 provides a summary of the environmental review process for the Modified Project and a summary of public participation in the environmental review for the Project.
- (d) Section 4 sets forth the findings regarding the potential impact areas identified in the SEIR for which the County has determined that there is no impact or the impact is less than significant. For these impacts, because there is either no or a less than significant impact, no mitigation is required.
- (e) Section 5 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. In order to ensure compliance and implementation, all applicable mitigation measures are included in the Mitigation Monitoring and Reporting Program for the Modified Project, and have been adopted as conditions of approval for the Modified Project by the County.

- (f) Section 6 sets forth findings regarding significant environmental impacts for the 2017 Project identified in the State-certified EIR that will remain significant and unavoidable despite the identification and incorporation of all feasible mitigation measures and alternatives identified in the State-certified EIR as supplemented by the SEIR. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant environmental impacts.
- (g) Section 7 sets forth findings regarding alternatives considered in the SEIR for the Modified Project.
- (h) Section 8 contains findings regarding growth-inducing impacts.
- (i) Section 9 contains the Statement of Overriding Considerations, explaining the County's determination to approve the Modified Project notwithstanding significant unavoidable impacts for the 2017 Project identified in the State-certified EIR. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant environmental impacts.

C. Custodian and Location of Records

The following Findings are based in part on the information contained in the SEIR for the Modified Project, which supplemented the State-certified EIR, as well as additional facts found in the complete Record of Proceedings.

For purposes of CEQA and these Findings, the record of proceedings for the Modified Project (Record of Proceedings) consists of the following documents and other evidence, at a minimum:

- The State-certified EIR;
- The CDFW Findings;
- The Notice of Preparation for the SEIR distributed by the County on October 7, 2021;
- The SEIR for the Modified Project, including, without limitation, the Draft SEIR, Final SEIR, and all of its appendices;
- All documents, studies, CEQA documents, maps, rules, regulations, guidelines, permits and other documents and materials incorporated by reference in any portion of the SEIR;
- All written and oral public testimony presented during every noticed public meeting and public hearing for the Modified Project, and all transcripts, audiotapes, videotapes and digital tapes thereof;

- The Mitigation Monitoring and Reporting Program for the Modified Project;
- Matters of common knowledge to the County, including but not limited to federal, state and local laws and regulations, including, without limitation, the County Code, Zoning Code, Ordinances, Resolutions, and adopted CEQA Procedures;
- Any documents expressly cited in these Findings and/or in the Statement of Overriding Considerations; and
- All materials not otherwise identified which are expressly required to be in the Record of Proceedings by Public Resources Code Section 21167.6(e).

The County maintains electronic copies of the documents and other materials which constitute the Record of Proceedings and can be requested at the County of Los Angeles, Department of Regional Planning, 320 West Temple Street, Los Angeles, California, 90012. The County Department of Regional Planning is the custodian of the Record of Proceedings. Electronic copies of those documents are and at all relevant times have been and will be available upon request at the offices of the Department of Regional Planning. This information is provided in compliance with Public Resources Code § 21081.6(a)(2) and Guidelines § 15091(e).

II. PROJECT SUMMARY

A. Modified Project Location

The Modified Project Site is located within the northwest portion of the County, west of Interstate 5 and the City of Santa Clarita. The Modified Project Site is located in an unincorporated area of the County, within the Santa Clarita Valley. The Entrada South Planning Area consists of approximately 382.3 acres located west of I-5 and The Old Road and predominantly south of Six Flags Magic Mountain theme park. The VCC Planning Area consists of approximately 328.5 acres of an undeveloped portion of the previously approved Valencia Commerce Center industrial/business park located west of I-5 and north of State Route 126. As previously discussed, the Modified Project Site is located within the planning boundary of the State-approved Newhall Ranch RMDP/SCP.

B. Modified Project Description

A more detailed description of the proposed changes associated with the Modified Project as compared to the 2017 Project including refinements to the housing types and site plan is provided in Chapter 3.0, Project Description, of the Final SEIR. A summary of the Modified Project's changes to the balance of residential and non-residential development is shown in Table 3.0-1 in the SEIR, reproduced below:

**Table 3.0-1
Summary of 2017 Project and Modified Project Development**

| Land Use | 2017 Approved Project | Modified Project | Difference |
|--|------------------------------|-------------------------|-------------------|
| Entrada South Planning Area | | | |
| Residential | 1,725 units | 1,574 units | - 151 units |
| Non-Residential | 450,000 SF | 730,000 SF | + 280,000 SF |
| VCC Planning Area | | | |
| Residential | 0 units | 0 units | 0 units |
| Non-Residential | 3,400,000 SF | 3,400,000 SF | 0 SF |
| <hr/> <i>SF = square feet</i> <i>Source: FivePoint, 2022.</i> | | | |

The Modified Project also includes enhanced environmental protections within each Planning Area. Within the Entrada South Planning Area, the Modified Project would increase environmental protections to jurisdictional waters and related biological resources within the Entrada South Planning Area as compared to the 2017 Project. Specifically, the 2017 Project design assumed the majority of Unnamed Canyon 2 within the Entrada South Planning Area would be enclosed in a buried storm drain. Instead, the Modified Project includes the enhancement and restoration of portions of the Unnamed Canyon 2 drainage channel wherein much of the channel would remain an open channel from the southern site boundary to Magic Mountain Parkway, except for a culvert street crossing. Thus, the modified channel design would reduce permanent impacts to biological resources and jurisdictional waters and provide additional open space within the developed portions of the Entrada South Planning Area. This environmentally beneficial modification would result in increased open space, restored drainage areas, and increased habitat for species as compared to the impacts evaluated in the State-certified EIR.

In the VCC Planning Area, the Modified Project would provide increased environmental protections to wetlands and related biological resources by reducing permanent impacts to Hasley Creek and Castaic Creek. Although these areas may be temporarily impacted during construction, as analyzed in the State-certified EIR, they would be restored and revegetated after construction based on the Modified Project design, thereby reducing permanent impacts to certain vegetation communities and jurisdictional stream habitat. Changes to the Hasley Creek improvements include a new alignment to follow the existing streambed more closely, allowing for a wider channel, and eliminating the series of drop structures that were included in the 2017 Project. In addition, more of the Castaic Creek floodplain would be preserved by adjusting the bank protection alignments required for development further away from the creek bed. These Modified Project design changes would maintain substantially more existing streambed, preserve

more jurisdictional area, and provide stable systems for conveyance and flood protection through the on-site reaches of both Castaic Creek and Hasley Creek compared to the 2017 Project.

The Modified Project entitlements from the County include the following:

Entrada South Planning Area

- **Vesting Tentative Tract Map No. 53295.** The tract map will subdivide the 382.3-acre Entrada South Planning Area into a total of 200 lots.
- **Zone Change No. 00-210.** Change the existing R-1 zoning south of Magic Mountain Parkway to MXD—Mixed Use Development Zone. Consistent with County Code Section 22.26.030, the MXD zone allows for a mixture of residential, commercial, and limited light industrial uses and buildings. The MXD zone integrates a wide range of housing densities with community-serving commercial uses to serve local residents, employees, pedestrians, and consumers.
- **Conditional Use Permit No. 00-210.** This CUP authorizes: (1) grading within the Entrada South Planning Area in excess of 100,000 cubic yards, hauling dirt across public rights of way immediately adjacent to the Entrada South site, and retaining walls in excess of 10 feet; (2) development in a hillside management area; and (3) a hotel use of approximately 165,000 square feet and approximately 75 feet in height, a conditionally permitted use within the C-3 zoning designation north of Magic Mountain Parkway.
- **Parking Permit No. 200700013.** The Parking Permit authorizes shared and reciprocal parking across lot lines within the Entrada South Planning Area.
- **Oak Tree Permit No. 200700018.** The County Code contains provisions to protect trees of the oak genus. The removal or damage of certain protected oak trees is unlawful without a permit per County Code Section 22.56.2050. The Oak Tree Permit authorizes removal of up to 34 oak trees (no heritage oaks) and encroachment on one heritage oak tree.
- **[Development Agreement.** A Development Agreement in accordance with Government Code Section 65864 et seq. memorializes the Modified Project’s terms, conditions, and obligations and provide vesting development rights for all of the Modified Project components. The Development Agreement will not increase the level of development or the disturbance footprint of the Modified Project. The Development Agreement establishes commitments by the Applicant to provide additional environmental and project benefits.]
- **[Housing Permit No. RPPL202400343.** Because the Modified Project will include affordable housing units consistent with the County’s Inclusionary Housing Ordinance or a potential Development Agreement, a Housing Permit is provided pursuant to Chapter 22.166 of the County Code.]

- Encroachment permits or similar ministerial approvals needed to construct off-site improvements, and other relevant implementation approvals for the Modified Project, if necessary.

VCC Planning Area

- **Vesting Tentative Parcel Map No. 18108.** The proposed parcel map subdivides the VCC Planning Area into a total of 104 lots.
- **Parking Permit No. RPPL2022007239.** The parking permit authorizes shared and reciprocal parking across lot lines within the VCC Planning Area.
- **Oak Tree Permit No. 200700022.** The Oak Tree Permit authorizes removal of up to 26 oak trees (no heritage oaks). No encroachments would occur.
- **[Development Agreement.** A Development Agreement in accordance with Government Code Section 65864 et seq. memorializes the Modified Project’s terms, conditions, and obligations and provide vesting development rights for all of the Modified Project components. The Development Agreement will not increase the level of development or the disturbance footprint of the Modified Project. The Development Agreement establishes commitments by the Applicant to provide additional environmental benefits.]
- **Federal Floodplain Map Revisions.** Conditional Letters of Map Revision for Castaic Creek and Hasley Creek to revise the FEMA floodplain within the Project Site. Following construction of the bank protection, FEMA will adopt a Letter of Map Revision.
- **County Floodway Map Revisions.** Updates to County floodway/floodplain maps following construction of the buried bank stabilization for Castaic Creek and Halsey Creek.
- Encroachment permits or similar ministerial approvals needed to construct off-site improvements, and other relevant implementation approvals for the Modified Project, if necessary.

C. Modified Project Objectives

Section 15124(b) of the CEQA Guidelines requires the EIR Project Description to contain “a statement of the objectives sought by the proposed project.” In addition, CEQA Guidelines Section 15124(b) states “the statement of objectives should include the underlying purpose of the project.”

As described in Chapter 3.0, Project Description, of the Final SEIR, the underlying purpose of the Modified Project is to implement the development and resource management activities in the previously-approved 2017 Project in the Entrada South and VCC Planning Areas, with Project modifications that preserve and enhance on-site natural resources in a

Modified Project design that includes fewer residential uses and more commercial uses. The Modified Project would result in a mixed-use community that provides housing, non-residential commercial and industrial/business/office park uses, recreational areas, public facilities, and economic opportunities.

The Modified Project incorporates by reference the applicable CEQA Project Objectives from the State-certified EIR. The following Project Objectives from the State-certified EIR are applicable to the Project:

- To implement an RMDP that achieves the basic objectives of the County’s approved Specific Plan. The basic objectives are:
 - Land Use Basic Objectives:
 - Create a major new community with interrelated Villages that allows for residential, commercial and industrial development, while preserving significant natural resources, important landforms and open areas.
 - Avoid leapfrog development and accommodate projected regional growth in a location which is adjacent to existing and planned infrastructure, urban services, transportation corridors, and major employment centers.
 - Cluster development within the site to preserve regionally significant natural resource areas, sensitive habitat, and major landforms.
 - Provide development and transitional land use patterns which do not conflict with surrounding communities and land uses.
 - Arrange land uses to reduce vehicle miles traveled and energy consumption.
 - Provide a complementary and supportive array of land uses which will enable development of a community with homes, shopping, employment, schools, recreation, cultural and worship facilities, public services, and open areas.
 - Organize development into Villages to create a unique identity and sense of community for each.
 - Design Villages where a variety of higher intensity residential and nonresidential land uses are located in proximity to each other and to major road corridors and transit stops.

- Establish land uses and development regulations that permit a wide range of housing densities, types, styles, prices, and tenancy (for sale and rental).
 - Designate sites for needed public facilities such as schools, fire stations, libraries, water reclamation plant and parks.
 - Allow for the development of community services and amenities by the public and private sectors, such as medical facilities, child care, colleges, worship facilities, cultural facilities, and commercial recreation.
 - Create a physically safe environment by avoiding building on fault lines and avoiding or correcting other geologically unstable landforms; by constructing flood control infrastructure to protect urban areas; and by implementing a fuel modification program to protect against wildfire.
- Economic Basic Objectives:
- Provide a tax base to support public services.
 - To develop and implement a practicable and feasible SCP that would permanently protect and manage a system of preserves designed to maximize the long-term persistence of the spineflower within the applicant's land holdings containing known spineflower populations, and to authorize the take of spineflower in areas located outside of designated preserves.

Below are additional specific objectives for the Modified Project:

- Incorporate enhanced environmental benefits into the design of the on-site drainage channels to reduce permanent habitat impacts compared to the 2017 Project as analyzed in the State-certified EIR.
- Implement development of the Entrada South Planning Areas consistent with the Santa Clarita Valley Area Plan (One Valley One Vision, 2012), which is part of the County General Plan.
- Promote sustainable development by implementing the State-certified EIR's greenhouse gas mitigation program to achieve net zero greenhouse gas emissions for the Entrada South and VCC Planning Areas.
- Provide additional housing opportunities in furtherance of the goals of the County's 2021-2029 Housing Element update to the General Plan, including the County's Regional Housing Needs Assessment allocation, which serves the

surrounding area by providing housing in a range of unit types, affordability levels, and sizes near major employment centers, transportation corridors, and transit centers.

III. SUMMARY OF CALIFORNIA ENVIRONMENTAL QUALITY ACT REVIEW

As discussed in Section 1.0, Introduction, above, the Entrada South and VCC Project Site is located within the planning boundary of the Newhall Ranch RMDP/SCP approved by CDFW, which was the subject of the State-certified EIR. The State-certified EIR was originally certified by CDFW in December 2010, which was comprised of a Draft EIR circulated for public review in August 2009, the Final EIR in June 2010, an “Addendum/ Additional Information” published in November 2010, and all supporting technical appendices and reports. In response to litigation challenging the 2010 certification, CDFW published a Draft Additional Environmental Analysis (AEA) and supporting technical materials in November 2016, responded to public comments, and, on June 14, 2017, determined “CDFW has reviewed and considered the information contained in the 2010 Final EIR and the 2017 AEA, finds that the 2010 Final EIR and 2017 AEA reflect its independent judgment and discretion, finds that the 2010 Final EIR and the 2017 AEA were completed in compliance with CEQA; and CDFW hereby certifies the 2017 AEA, in combination with the 2010 Final EIR.” (CDFW, Final Actions and Supplemental Findings for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan, June 14, 2017.) Accordingly, references to the State-certified EIR within these Findings refer to the entirety of the record considered and certified by CDFW. References to “CDFW Findings” refer to both CDFW’s 2010 Findings and 2017 Findings for the 2017 Project.

The Modified Project areas described in the SEIR were identified in the State-certified EIR as the Entrada South Planning Area and the VCC Planning Area. The County of Los Angeles was a responsible agency for the RMDP/SCP and participated in the State-certified EIR process through the receipt and review of the Draft and Final EIRs, as well as the Draft and Final Additional Environmental Analysis, and the submittal of comments, which were addressed by CDFW.

Buildout of Entrada South and the Valencia Commerce Center has long been included in County plans for which EIRs have previously been certified, including the Santa Clarita Valley Area Plan (One Valley One Vision, 2012), which is part of the County General Plan, the 2021-2029 Housing Element update to the County General Plan, and General Plan 2035. Buildout of Entrada South and the Valencia Commerce Center has also long been included in each of three “Connect SoCal” plans (approved by the Southern California Association of Governments [“SCAG”] in 2016, 2020 and 2024) that integrate land use and transportation planning to achieve state greenhouse gas reduction climate goals, for which EIRs were likewise certified by SCAG in 2016, 2020 and 2024. These approved local and regional plans, with accompanying EIRs, all include buildout of Entrada South and the Valencia Commerce Center and serve as pre-existing policy-level approvals (informed by certified CEQA documentation).

As described above, the Modified Project reflects minor changes and refinements related to the development of the Entrada and VCC Planning Areas, as compared to the 2017 Project. Therefore, in accordance with Public Resources Code Section 21080, the Modified Project is subject to environmental review requirements under CEQA. For purposes of CEQA, the County

is the Lead Agency for the Modified Project. See Section 3.1 of these Findings for a description of the scope of the SEIR in accordance with CEQA. The County prepared the SEIR pursuant to CEQA to assess the environmental effects associated with implementation of the Modified Project, as well as the anticipated associated discretionary actions and approvals for the Modified Project, all as compared to the 2017 Project and its associated environmental analysis in the State-certified EIR.

The County published a Draft SEIR on December 20, 2024 for a 60-day public review and comment period ending on February 18, 2025. A Final SEIR was prepared after the close of public review in compliance with CEQA requirements. The Final SEIR has been prepared in accordance with CEQA and the CEQA Guidelines, as amended. As authorized in State CEQA Guidelines Section 15084(d)(2), the County retained a consultant to assist with the preparation of the environmental documents. County staff from multiple departments including but not limited to the Department of Regional Planning, Subdivisions Section, representing the Lead Agency, have directed, reviewed, and modified where appropriate all material prepared by the consultant. The Final SEIR reflects the County's independent analysis and judgment. The key milestones associated with the preparation of the SEIR are summarized below. As presented below, an extensive public involvement and agency notification effort was conducted to solicit input on the scope and content of the SEIR and to solicit comments on the results of the environmental analysis presented in the Draft SEIR.

A. Scope and Approach of SEIR

CEQA dictates when a supplemental or subsequent EIR is required for changes made to a project that was previously analyzed under CEQA. Once a project has been approved based on a CEQA analysis contained in an EIR or negative declaration, and the EIR or negative declaration is no longer subject to challenge, CEQA Section 21166 provides that “no subsequent or supplemental environmental impact report shall be required by the lead agency or any responsible agency” unless one of three circumstances apply: (1) substantial changes to the approved project will require major revisions to the certified EIR; (2) substantial changes occur with respect to the circumstances under which the approved project is being undertaken will require major revisions to the certified EIR; or (3) new information that was not known and could not have been known at the time the EIR for the approved project was certified becomes available.

CEQA Guidelines Section 15162 clarifies that “new information” is new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following: (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration; (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR; (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous

EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.²

When preparing a supplemental EIR, the additional CEQA analysis focuses on the incremental changes in the project, changes in circumstances, or new information that was not known or could not have been known in comparison to the analysis in the prior certified EIR.³ The CEQA Guidelines, specifically Sections 15162 and 15163, further delineate the circumstances under which a supplemental EIR is warranted, focusing on changes to the project, changed circumstances, or new information that may reveal significant environmental impacts not addressed in the original EIR. As articulated in *Friends of College of San Mateo Gardens v. San Mateo County Community College District*, “[t]he purpose behind the requirement of a subsequent or supplemental EIR or negative declaration is to explore environmental impacts not considered in the original environmental document. ... The event of a change in a project is not an occasion to revisit environmental concerns laid to rest in the original analysis. Only changed circumstances ... are at issue.”⁴

Thus, when utilizing a supplemental EIR, the project analyzed in the previous EIR is the baseline, even if the project has not been fully constructed, thereby limiting the scope of subsequent environmental review to project modifications or environmental impacts not previously considered.⁵ In other words, a supplemental EIR is not a “ground up” analysis of the project that already received environmental clearance through a previously-certified EIR, but instead is focused only on the changes to the project since that previous EIR was completed, along with applicable new information or changed circumstances that are relevant to the assessment of environmental impacts.

A supplemental EIR pursuant to Guidelines Section 15163(a) is appropriate to analyze the Modified Project under CEQA because the County determined the factors in Section 15162 may apply and only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation. (See Initial Study, Appendix 1 of the SEIR, Introduction.) As described above, the Modified Project reflects minor changes and

² See *Concerned Dublin Citizens v. City of Dublin*, 214 Cal. App. 4th 1301, 1320 (2013) (court upheld exemption determination for project under Government Code Section 65457 because, in part, new information did not include analysis of greenhouse gas emissions even though prior EIR in 2002 did not expressly analyze greenhouse gas emissions because climate change was an issue that was known at the time of the prior EIR).

³ See CEQA Guidelines Section 15163(b); *Friends of the College of San Mateo Gardens v. San Mateo County Community College District* (2016) 1 Cal.4th 937, 949; *Benton v. Board of Supervisors* (1991) 226 Cal.App.3d 1467, 1482.

⁴ *Friends of College of San Mateo Gardens* (2016) 1 Cal.5th 937, 949.

⁵ For example, in *Sierra Club v. City of Orange*, the court upheld the inclusion of traffic conditions from a previously analyzed project in the baseline, stating, “[w]hen a lead agency is considering whether to prepare an SEIR, it is specifically authorized to limit its consideration of the later project to effects not considered in connection with the earlier project.” *Sierra Club v. City of Orange* (2008) 163 Cal. App. 4th 523, 543.

refinements to the development evaluated in the State-certified EIR for the 2017 Project, including changes to enhance environmental benefits.

As further described in Section 1.0 – Introduction, of the Draft SEIR, in accordance with Section 15163 of the CEQA Guidelines, the Draft SEIR:

- Incorporates the State-certified EIR by reference, as discussed in Section 3.0, Project Description, of the Draft SEIR, and describes the impact conclusions of the State-certified by topic area.
- Contains information necessary for the Draft SEIR to adequately analyze the Modified Project's potential environmental impacts.
- Applies all applicable mitigation measures and PDFs from the State-certified EIR to the Modified Project, as documented and included in the Appendix 2, MMRP, of the Draft SEIR, which is enforceable by the County.
- Evaluates the potential environmental impacts of the changes to the 2017 Project that are proposed as part of the Modified Project. When evaluating whether changes to the Modified Project would result in new significant environmental impacts or substantially more severe significant environmental impacts, this Draft SEIR considers the incremental difference between the 2017 Project and the Modified Project, changes in circumstances, or new information that was not known or could not have been known in comparison to the analysis in the State-certified EIR.

For each environmental impact area, the Initial Study or the Draft SEIR, as applicable, analyzed whether the Modified Project would result in any new or substantially more severe significant environmental impacts as compared to the 2017 Project based on project changes, new information, or changed circumstances, in accordance with CEQA Guidelines Section 15162 and 15163. For those areas where there are no new or substantially more severe significant environmental impacts due to the changes between the Modified Project and 2017 Project, no new mitigation measures are required to be considered. For those areas where there are potentially new significant environmental impacts or substantially more severe significant environmental impacts, new feasible mitigation measures have been considered and proposed to reduce those new or substantially more severe impacts to less than significant.⁶

The Project Applicant has also proposed a number of new PDFs to *further reduce* Modified Project impacts that are not new or substantially more severe significant impacts than those associated with the 2017 Project as analyzed in the State-certified EIR. These PDFs are part of the proposed Modified Project and include design elements or additional, voluntary measures that reduce the impacts of the Modified Project. However, the Draft SEIR does not

⁶ It is noted that because the Draft SEIR did not identify any significant new adverse environmental impacts, or substantially more severe significant environmental impacts, compared to the 2017 Project analyzed in the State-certified EIR, based on project changes, changed circumstances and new information.

utilize PDFs as mitigation to reduce potentially significant impacts of the Modified Project; rather, where necessary, the Draft SEIR applies mitigation measures to mitigate new or substantially more severe impacts compared to the 2017 Project.

B. Public Notification and Outreach

1. Notice of Preparation and Scoping

The County determined that an SEIR would be required for the Modified Project and issued a Notice of Preparation (NOP) and Initial Study on October 7, 2021. Signs noticing the NOP and Initial Study were also posted on both Entrada South and VCC on October 6, 2021. The NOP and Initial Study were circulated for a 30-day public review period consistent with CEQA Guidelines Section 15082(b). The review period ended on November 8, 2021. The County also conducted a virtual public scoping meeting for the purpose of soliciting oral and written comments from interested parties as to the appropriate scope and content of the Draft SEIR on October 19, 2021.

The NOP and Scoping Meeting notice were sent to all responsible/trustee agencies and individuals that had requested to be informed about the Modified Project in order to solicit feedback from federal, State, regional, and local government agencies and interested parties on the scope and content of the Draft SEIR for the Modified Project. The NOP was also sent to property owners and occupants within a 1,000-foot radius of the Project Site. The NOP and Notice of Scoping Meeting was published in the Santa Clarita Valley Signal on October 7, 2021. Copies of the NOP were also made available at the Department of Regional Planning's website at <https://planning.lacounty.gov/case/view/pm18108> (Valencia Commerce Center and <https://planning.lacounty.gov/case/view/tr083582> (Entrada South), the County of Los Angeles Public Information Office, and the following libraries: Valencia, Castaic, Stevenson Ranch, Old Town Newhall, and Canyon County Jo Anne Darcy.

The Scoping Meeting was held on October 19, 2021 via ZOOM. Comments on the NOP were received from agencies, tribes, organizations, businesses, and individuals, which are included in Appendix 1 to the Draft SEIR. Topics of the NOP comments included air quality, biological resources, cultural resources, hazards and hazardous materials, hydrology, water quality, land use and planning, noise, transportation, tribal cultural resources, utilities and service systems, and wildfire. The Draft SEIR took into consideration the comments received from the public and various agencies in response to the NOP and during the public scoping meeting held on October 19, 2021. Written comments received in response to the NOP and during the scoping meeting are provided in Appendix 1A and Appendix 1B of the Draft SEIR, respectively. Based on the scoping process, potential areas of controversy known to the County included air quality, biological resources, environmental safety, fire protection services, land use and planning, police protection services, noise, transportation, water resources, and wastewater generation.

2. Public Review of Draft Supplemental Environmental Impact Report and Public Outreach

Upon completion of the Draft SEIR, notice of the public review period was given in accordance with Section 15087 of the CEQA Guidelines. Based on the Initial Study, included as

Appendix 1 to the Draft SEIR, the following issues were screened out from further review because the issues would not cause any new significant impacts or substantially more severe significant impacts compared to the 2017 Project: aesthetics; agricultural and forestry resources; objectionable odors; conflicts with habitat conservation plans; historical resources; paleontological resources; human remains; energy; geology and soils; greenhouse gas emissions; hazardous materials sites; safety hazards within an airport land use plan or two miles of a public airport or private airstrip; emergency response and evacuation plans; groundwater hydrology; inundation in flood hazard, tsunami, or seiche zones; physical division of an established community; conflicts with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect; mineral resources; vibration; excessive noise levels within an airport land use plan or two miles of a public airport or private airstrip; population and housing; sheriff protection; schools; parks; libraries; other public facilities; recreation; transportation hazards; emergency access; and utility infrastructure.

On December 20, 2024, a Notice of Completion and Notice of Availability (NOC and NOA) of the Draft SEIR was prepared and distributed to the State Office of Land Use and Climate Innovation, Los Angeles County Clerk, responsible and trustee agencies, organizations, interested parties, property owners and occupants within a 1,000-foot radius of the Project site, and all parties who requested a copy of the SEIR in accordance with CEQA. Signs noticing the NOC and NOA were also posted on both Entrada South and VCC on December 19, 2024. The County decided to provide a voluntary extension beyond the CEQA-mandated 45-day public review period to a 60-day public review period beginning December 20, 2024, and ending February 18, 2025.

The NOC and Draft SEIR were posted on the County's website for viewing and downloading at <https://bit.ly/41vvaG0> and the following locations:

- Valencia Library, 23743 W. Valencia Boulevard, Santa Clarita
- Castaic Library, 27971 Sloan Canyon Road, Castaic
- Stevenson Ranch Library, 25950 The Old Road, Stevenson Ranch
- Old Town Newhall Library, 24500 Main Street, Santa Clarita
- Canyon Country Jo Anne Darcy Library, 18601 Soledad Canyon Road, Santa Clarita

Newspaper advertisements of the NOC and NOA and SEIR comment period were placed in the following papers:

- Santa Clarita Valley Signal – A daily publication. The NOC and NOA was published on December 14, 2024.

A commenter on the Draft SEIR claimed that an extension of the comment period was required because of “access issues” that diminished the public ability to obtain and review the Draft SEIR. As discussed in Response to Comment No. 9-2, noticing and public review of the

Draft SEIR was conducted in accordance with the CEQA Guidelines. As noted above, the Draft SEIR was made available at the Department of Regional Plan and multiple local libraries in accordance with CEQA. With respect to the public review period, CEQA Guidelines Section 15105(a) requires that EIRs submitted to the State Clearinghouse for review by state agencies be circulated for a 45-day public review period. In this case, the Draft SEIR was circulated for an extended 60-day public review period, which is in excess of this 45-day requirement.

In summary, the County conducted all required noticing and scoping for the Modified Project in accordance with Section 15083 of the CEQA Guidelines, and conducted the public review for the SEIR, in accordance with the requirements of Section 15087 of the CEQA Guidelines.

3. Final Supplemental Environmental Impact Report

The County prepared a Final SEIR, including the Responses to Comments to the Draft SEIR. The Final SEIR/Response to Comments contains comments on the Draft SEIR, responses to those comments, revisions to the Draft SEIR, and appended documents. A total of 11 comment letters were received.

The State-certified EIR concluded that impacts associated with the 2017 Project would result in significant and unavoidable project level impacts related to aesthetics, agriculture, air quality, land use, and solid waste and cumulative impacts to noise and wildfire. The Final SEIR evaluated the potential for environmental impacts based on changes, new information, or changed circumstances for the Modified Project compared to the 2017 Project. The Final SEIR found that the Modified Project would not result in any new significant and unavoidable impacts or substantially increase the severity of any of the significant and unavoidable impacts for the 2017 Project as identified by the State-certified EIR. The County prepared a Statement of Overriding Considerations for the impacts identified in the State-certified EIR as significant and unavoidable.

C. Findings On Responses To Comments On The Draft SEIR, Revisions To The Final SEIR, and Recirculation

The Final SEIR contains responses to comments, revisions, clarifications, and corrections to the Draft SEIR. The focus of the response to comments is on the disposition of significant environmental issues as raised in the comments, as specified by State CEQA Guidelines Section 15088. The Final SEIR includes a written response to each public agency on comments made by that public agency on June 1, 2025, pursuant to State CEQA Guidelines Section 15088(b). There were a total of 11 comments on the Draft SEIR, five by public agencies, one by tribes, three by community groups, and two by individuals. As required by Section 15088 of the State CEQA Guidelines, responses to these comments were prepared and provided to the agencies and interested parties. Commenters raised concerns regarding the Modified Project's impacts related to air quality, biology, GHG, noise, solid waste, transportation, water supply, wastewater, and wildfire. As described more fully in Sections IV through VI, below, while certain changes were made to the SEIR in response to these comments, the Final EIR does not include significant new information that requires recirculation of the Draft SEIR for further public comment under CEQA Guidelines Section 15088.5. Therefore, the County adopts the following findings with respect to

whether to recirculate the Draft SEIR. Under Section 15088.5 of the CEQA Guidelines, recirculation of an EIR is required when “significant new information” is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term “information” can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- 1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- 2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- 3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
- 4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (CEQA Guidelines Section 15088.5)

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The above standard is “not intend[ed] to promote endless rounds of revision and recirculation of EIRs.” (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1993) 6 Cal. 4th 1112, 1132.) “Recirculation was intended to be an exception, rather than the general rule.” (*Ibid.*) The County recognizes that the Final SEIR contains additions, clarifications, modifications, and other changes to the Draft SEIR. Some comments on the Draft SEIR either expressly or impliedly sought changes to proposed mitigation measures identified in the Draft SEIR as well as additional mitigation measures. Where changes have been made, these changes do not change the significance of any conclusions presented in the Draft SEIR and do not result in any new or substantially more severe significant impacts for the Modified Project.

CEQA case law emphasizes that “[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal.” (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736-737; see also *River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 168, fn. 11.) “CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from

the process. In short, a project must be open for public discussion and subject to agency modification during the CEQA process.” (*Concerned Citizens of Costa Mesa, Inc. v. 33rd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936 (internal citations omitted).) Here, the clarifications made to the Draft SEIR in the Final SEIR are exactly the kind of revisions that the case law recognizes as legitimate and proper.

The County finds that none of the revisions to the Draft SEIR made by, or discussion included in, the Final SEIR involves “significant new information” triggering recirculation because the revisions do not result in any new significant environmental effects, substantial increase in the severity of previously identified significant effects, or feasible project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the Modified Project but the proponents decline to adopt it. Similarly, no documentation produced by, or submitted to, the County and relied on by the County after publication of the Final SEIR identifies any new significant environmental effects, substantial increase in the severity of previously identified significant effects, or feasible project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the Modified Project but the proponents decline to adopt it. All additional documentation relied on by the County merely clarifies or amplifies conclusions in the SEIR. These therefore represent the kind of supplemental information that is received during the environmental review process as it works towards its conclusion. Under such circumstances, the County hereby finds that recirculation of the SEIR is not required.

D. County Proceedings

The Final SEIR document was released on [date] for viewing and download with the previously posted Draft SEIR prior to the County’s consideration of the Final SEIR and Project recommendations on the same website noted above for the posting of the Draft SEIR: <https://bit.ly/41vvaG0>.

The Los Angeles County Regional Planning Commission ("Commission") hearing to consider recommending certification of the SEIR and approval of the Modified Project was held October 1, 2025, more than 10 days after issuance of the Final SEIR as required by CEQA. A notice of the Commission hearing is available here: <https://lacdrp.legistar.com/View.ashx?M=F&ID=14813774&GUID=50C0456E-98D3-4F97-9A52-8F1B2B0A4553>. The Commission received testimony from the community on the Modified Project and the Final SEIR. On October 1, 2025, the Planning Commission voted to recommend approval of the Modified Project, certification of the SEIR, and adoption of the CEQA Findings and Statement of Overriding Considerations.

The Los Angeles County Board of Supervisors ("Board") hearing to consider certification of the SEIR and approval of the Modified Project was held [TBD], more than 10 days after issuance of the Final SEIR as required by CEQA. A notice of the Board hearing is available here: _____ . The Board received testimony from the community on the Modified Project and the Final SEIR. On [TBD], the Board voted to approve the Modified Project, certified the SEIR, and adopted the CEQA Findings and Statement of Overriding Considerations.

None of the written comments or oral testimony presented to the Commission or the Board required recirculation of the SEIR pursuant to CEQA Guidelines section 15088.

E. Certification of the Final EIR

In accordance with Section 15090 of the CEQA Guidelines, the County, based on the findings included herein, hereby certifies that:

- (a) The Final SEIR has been completed in compliance with CEQA;
- (b) The Final SEIR was presented to the decisionmaking body of the lead agency and that the decisionmaking body reviewed and considered the information contained in the Final SEIR prior to approving the project; and
- (c) The Final SEIR reflects the lead agency's independent judgment and analysis.

IV. IMPACTS FOUND TO BE LESS THAN SIGNIFICANT PRIOR TO MITIGATION

These findings do not repeat the full discussions of environmental impacts contained in the Supplemental EIR prepared for the Modified Project, which supplements the State-certified EIR, including the Initial Study for the SEIR, which screened out various topics from requiring additional review in the SEIR, as described above. The County certifies, adopts and incorporates the analysis, explanation, findings, responses to comments, and conclusions of the Supplemental EIR. The County adopts the reasoning of the Supplemental EIR and County staff reports regarding the Project.

CEQA does not require findings for impacts that are found to be less than significant prior to mitigation. The State-certified EIR found the following categories of impacts of the 2017 Project to be less than significant and did not require mitigation. The Draft SEIR did not identify any new or substantially more severe significant impacts related to these categories of impacts. Responses to comments on the Draft SEIR included comments on some of these impacts, and as applicable these comments and responses are summarized below. Comments received did not result in changing the Draft SEIR's conclusions that the Modified Project does not result in new significant impacts or substantially more severe significant impacts compared to the 2017 Project. The public comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR, do not involve "significant new information" triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments in satisfaction of CEQA.

A. Less Than Significant Agricultural Impacts

The State-certified EIR concluded the following categories of impacts of the 2017 Project were less than significant and did not require mitigation. The SEIR similarly concluded the

Modified Project would not result in any new or substantially more severe significant impacts related to these categories of impacts:

- Impacts related to zoning conflicts except on Entrada Planning Area (See Appendix 1 of the SEIR, Section 3)
- Impacts related to conflicts with existing off-site agricultural operations and Williamson Act contracts (See Appendix 1 of the SEIR, Section 3)

B. Less Than Significant Air Quality Impacts

The State-certified EIR concluded the following categories of impacts of the 2017 Project were less than significant and did not require mitigation. The SEIR similarly concluded the Modified Project would not result in any new or substantially more severe significant impacts related to these categories of impacts:

- Impacts to applicable air quality plans of the South Coast AQMD (SEIR Section 5.1-45)
- Operational localized emissions (SEIR Section 5.1-58-60)
- Construction toxic air contaminants (SEIR Section 5.1-60-61)
- Operational toxic air contaminants (SEIR Section 5.1-61-62)
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (See Appendix 1 of the SEIR, Section 3)

C. Less Than Significant Land Use and Planning Impacts

The State-certified EIR concluded the following categories of impacts of the 2017 Project were less than significant and did not require mitigation. The SEIR similarly concluded the Modified Project would not result in any new or substantially more severe significant impacts related to these categories of impacts:

- Conflicts with goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas (SEIR Section 5.7-19-28)
- The State-certified EIR determined a temporary significant and unavoidable project-level impact associated with conflicts with an applicable land use plan, policy, or regulation would occur due to establishment of a spineflower preserve in the Entrada South Planning Area, which would conflict with the site's then-existing agricultural zoning until such time as the County changed the zoning to align with planned development. The State-certified EIR acknowledged this impact was temporary pending the County's approval of a zone change but was nonetheless concluded to be

significant and unavoidable as implementation of the zone change was beyond the control of the Applicant at the time of the State-certified EIR. No feasible mitigation was identified. However, this impact no longer exists (i.e., the significant and unavoidable impact has been eliminated) because the agricultural zoning for the Entrada South Planning Area was removed by the Santa Clarita Valley Area Plan and the southern portion of Entrada South Planning Area is now zoned R-1 and C-R, which change occurred prior to the Notice of Publication for the SEIR. The elimination of this impact is consistent with the State-certified EIR's analysis, which acknowledged the impact would be temporary. (See SEIR Section 5.7-16)

D. Less Than Significant Transportation Impacts

The State-certified EIR concluded the following categories of impacts of the 2017 Project were less than significant and did not require mitigation. The SEIR similarly concluded the Modified Project would not result in any new or substantially more severe significant impacts related to these categories of impacts:

- Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities (SEIR Section 5.9-38-63)

E. Less Than Significant Water Supply Impacts

The State-certified EIR concluded the following categories of impacts of the 2017 Project were less than significant and did not require mitigation. The SEIR similarly concluded the Modified Project would not result in any new or substantially more severe significant impacts related to these categories of impacts:

- Sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years (See SEIR Section 5.11)

Comments and Summary of Responses to Comments

During the public comment period, a commenter raised “year after year of record-breaking temperature increases, reduced rainfall for groundwater recharge-water supply and massive wildfires caused by drought and dried vegetation” as changes that have occurred that were not previously predicted. As described in Response to Comment No. 9-8, an extensive analysis of water supply analysis was provided in Section 5.11, Water Supply, of the Draft SEIR. The Draft SEIR and WSA evaluated the potential threats of climate change, higher temperatures, drought, groundwater contamination (e.g., PFAS), and other factors that could impact short-term and long-term water supplies. The Draft SEIR and WSA included conservative assumptions to account for diminished water supplies, reduced storage, and higher temperatures that would result from climate change and higher temperatures.

A commenter also raised various other concerns related to the water supply analysis and claimed the analysis of water supply in the Draft SEIR relies upon the Urban Water Management Plan (UWMP) rather than a project-specific Water Supply Assessment (WSA) which is required for projects meeting certain criteria under state law (i.e., Senate Bill [SB] 610). However, as explained in Response to Comment No. 9-16, the Santa Clarita Valley Water Agency (SCVWA) prepared and approved a WSA for the Modified Project as required by SB 610. The Draft SEIR analysis of water supply and demand incorporated the WSA prepared for the Modified Project and included as Appendix 5.11a of the Draft SEIR. As stated in Resolution No. SCV-279 approving the WSA, the Board of the Santa Clarita Valley Water Agency “has determined, exercising its independent judgment, that a ‘sufficient water supply’ is available for the Project based on the requirements of Water Code section 10910 et seq...”

A commenter also claimed that the SCV Sustainable Ground Water Agency’s Ground Water Sustainability Plan forecasts severe drops in water level due to future development. As discussed in Responses to Comments No. 9-17 and 9-18, the comment does not provide a specific citation or explain how this statement results in a deficiency in the Draft SEIR’s analysis. The Response also describes how the Draft SEIR and WSA appropriately evaluated groundwater supplies and potential risks to groundwater.

A commenter stated that PFAS would cause the water agency to remove 45% of its wells from service. As discussed in Response to Comment No. 9-19, the Draft SEIR describes SCVWA’s approach for addressing PFAS and applying a diversified water portfolio to account for temporary disruptions in PFAS treatment. Further, Section 4 of the WSA addresses potential risks and uncertainties related to water quality, including potential PFAS and perchlorate contamination, how climate change may impact various sources of supplies and demand for water, and how ongoing development of new water use efficiency may affect water supplies and demands.

Thus, the comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve “significant new information” triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

F. Less Than Significant Wastewater Impacts

The State-certified EIR broadly evaluated wastewater impacts in Section 4.4, Water Quality, and concluded that impacts related to water quality standards or waste discharge requirements would be less than significant. The SEIR similarly concluded the Modified Project would not result in any new or substantially more severe significant impacts related to these categories of impacts:

- Relocation or construction of new or expanded wastewater treatment facilities (See Appendix 1 of the SEIR, Section 19)

Comments and Summary of Responses to Comments

During the public comment period, comments were received regarding the potential need for a permit for Industrial Wastewater Discharge from the Santa Clarita Valley Sanitation District. As explained in Response to Comment No. 5-3, Table 3.0-3 in the SEIR was updated to expressly mention a potential Industrial Wastewater Discharge Permit. Thus, the comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve “significant new information” triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

G. Less Than Significant Wildfire Impacts

The State-certified EIR concluded the following categories of impacts of the 2017 Project were less than significant and did not require mitigation. The SEIR similarly concluded the Modified Project would not result in any new or substantially more severe significant impacts related to these categories of impacts:

- Installation or maintenance of 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 (SEIR Section 5.14-68-69)
- Impacts associated with the provision of new or physically altered governmental facilities, or result in the need for 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 fire protection (SEIR Section 5.14-72-74)
- Exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located within an area with inadequate water and pressure to meet fire flow standards (SEIR Section 5.14-78-79)
- Exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located within proximity to land uses that have the potential for dangerous fire hazard (SEIR Section 5.14-79-81)

Comments and Summary of Responses to Comments

During the public comment period, comments were received that claimed the Draft SEIR’s analysis of wildfire was deficient but only generally referred to the Draft SEIR and inclusion of proposed Project Design Features. The comments did not specifically identify these topic areas. As described in more detailed below, the Draft SEIR and Final SEIR, including

Response to Comments, includes a comprehensive description and analysis of potential wildfire risks, including an extensive Fire Protection Plan. The Draft SEIR and Fire Protection Plan include detailed discussions and analysis of the applicable regulatory requirements, mitigation measures in the State-certified EIR, benefits of modern fire-resistant building code and fuel management standards adopted since the certification of the State-certified EIR, wildfire modeling specific to the Modified Project that estimates both onsite and offsite wildfire risk (including during extreme wind events), and other topics. As described in Section 5.14 Wildfire of the Draft SEIR, the Modified Project does not include modifications to the 2017 Project that would exacerbate wildfire risks compared to those identified in the State-certified EIR for the 2017 Project. Based on the extensive analysis and substantial evidence in the Draft SEIR and supporting Fire Protection Plan and Evacuation Plan, the Draft SEIR appropriately demonstrates that the Modified Project does not result in new or substantially more severe significant construction impacts, operational impacts, or cumulative impacts compared to the 2017 Project.

The comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve “significant new information” triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

V. IMPACTS REDUCED TO LESS THAN SIGNIFICANT WITH MITIGATION

The following impacts of the 2017 Project were determined in the State-certified EIR to be potentially significant absent mitigation. After application of mitigation, however, the impacts were determined to be less than significant. The SEIR did not identify any new or substantially more severe significant impacts related to these categories of impacts.

A. Aesthetics

- 2017 Project. The State-certified EIR identified potentially significant aesthetic impacts related to buildout of the VCC Planning Area. However, the State-certified EIR found that these impacts would be reduced to a less than significant level through previously adopted mitigation measures. The applicable mitigation measures are VCC-VR-1 through VCC-VR-11. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Section 4.15 of the State-certified EIR and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Applicable mitigation measures previously adopted for

the 2017 Project would continue to be implemented under the Modified Project.⁷ The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to aesthetics. Thus, no new mitigations measures are required. (See Appendix 1, Section 1 of the SEIR for additional information.)

- **Finding.** As detailed in the State-certified EIR, the 2017 Project's effect on aesthetic resources associated with the buildout of the VCC Planning Area was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)

B. Biological Resources

- **2017 Project.** The State-certified EIR identified potentially significant impacts relating to permanent loss of native vegetation communities and land covers, impacts to wildlife movement and habitat connectivity, sensitive natural communities, oak woodlands, direct and indirect impacts to common wildlife, special-status wildlife and special-status plants, and conflicts with local policies or ordinances protecting biological resources. The State-certified EIR also identified potentially significant impacts to wetlands and waters subject to state and/or federal jurisdiction through direct removal, filling, hydrologic interruption, loss of functions or services, or other means, and could result in permanent net loss of CDFW-jurisdictional streams or waters of the United States. However, the State-certified EIR found that these impacts would be reduced to a less than significant level through the mitigation measures analyzed in the State-certified EIR. The applicable mitigation measures⁸ are SP-4.6-1, SP-4.6-2, SP-4.6-3, SP-4.6-4, SP-4.6-5, SP-4.6-6, SP-4.6-7, SP-4.6-8, SP-4.6-9, SP-4.6-10, SP-4.6-11, SP-4.6-13, SP-4.6-14, SP-4.6-15, SP-4.6-16, SP-4.6-26a, SP-4.6-27, SP-4.6-28,

⁷ Although the State-certified EIR mitigation measures are generally applicable to the Modified Project as a whole and the VCC EIR mitigation measures are generally applicable to the VCC Planning Area, certain mitigation measures are no longer applicable, either because they: (1) have been previously implemented and completed; (2) are not specifically related to the Modified Project for geographic or other reasons; or (3) have been superseded by current regulatory requirements, new project design features, or other more protective mitigation measures, as discussed further in Appendix 3 of the Draft SEIR.

⁸ The full text of each applicable mitigation measure is provided in the Mitigation Monitoring and Reporting Program for the Modified Project.

SP-4.6-43, SP-4.6-47a, SP-4.6-48, SP-4.6-55, SP-4.6-56, SP-4.6-58, SP-4.6-62, SP-4.6-63, RMDP/SCP-BIO-1, RMDP/SCP-BIO-2, RMDP/SCP-BIO-3, RMDP/SCP-BIO-4, RMDP/SCP-BIO-5, RMDP/SCP-BIO-6, RMDP/SCP-BIO-7, RMDP/SCP-BIO-8, RMDP/SCP-BIO-9, RMDP/SCP-BIO-10, RMDP/SCP-BIO-12, RMDP/SCP-BIO-13, RMDP/SCP-BIO-15, RMDP/SCP-BIO-16, RMDP/SCP-BIO-17, RMDP/SCP-BIO-18, RMDP/SCP-BIO-20, RMDP/SCP-BIO-21, RMDP/SCP-BIO-22, RMDP/SCP-BIO-23, RMDP/SCP-BIO-24, RMDP/SCP-BIO-25, RMDP/SCP-BIO-26, RMDP/SCP-BIO-27, RMDP/SCP-BIO-28, RMDP/SCP-BIO-29, RMDP/SCP-BIO-30, RMDP/SCP-BIO-31, RMDP/SCP-BIO-32, RMDP/SCP-BIO-33, RMDP/SCP-BIO-34, RMDP/SCP-BIO-35, RMDP/SCP-BIO-36, RMDP/SCP-BIO-37, RMDP/SCP-BIO-38, RMDP/SCP-BIO-39, RMDP/SCP-BIO-40, RMDP/SCP-BIO-41, RMDP/SCP-BIO-42, RMDP/SCP-BIO-43, RMDP/SCP-BIO-45, RMDP/SCP-BIO-48, RMDP/SCP-BIO-49, RMDP/SCP-BIO-50, RMDP/SCP-BIO-52, RMDP/SCP-BIO-53, RMDP/SCP-BIO-54, RMDP/SCP-BIO-55, RMDP/SCP-BIO-56, RMDP/SCP-BIO-57, RMDP/SCP-BIO-58, RMDP/SCP-BIO-60, RMDP/SCP-BIO-61, RMDP/SCP-BIO-63, RMDP/SCP-BIO-64, RMDP/SCP-BIO-65, RMDP/SCP-BIO-66, RMDP/SCP-BIO-67, RMDP/SCP-BIO-68, RMDP/SCP-BIO-70, RMDP/SCP-BIO-71, RMDP/SCP-BIO-72, RMDP/SCP-BIO-73, RMDP/SCP-BIO-75, RMDP/SCP-BIO-76, RMDP/SCP-BIO-78, RMDP/SCP-BIO-80, RMDP/SCP-BIO-82, RMDP/SCP-BIO-83, RMDP/SCP-BIO-84, RMDP/SCP-BIO-85, RMDP/SCP-BIO-87, RMDP/SCP-BIO-88, RMDP/SCP-SW-3, RMDP/SCP-SW-4, RMDP/SCP-SW-6, VCC-SW-2; VCC-SW-3; VCC-SW-4; RMDP/SCP-AEA-3-1, RMDP/SCP-AEA-3-1a, RMDP/SCP-AEA-3-1b, RMDP/SCP-AEA-3-1c, RMDP/SCP-AEA-3-1e, RMDP/SCP-AEA-3-1f, RMDP/SCP-AEA-3-1k, RMDP/SCP-AEA-3-2, RMDP/SCP-AEA-3-2a, RMDP/SCP-AEA-3-2b, RMDP/SCP-AEA-3-2c, RMDP/SCP-AEA-3-2d, RMDP/SCP-AEA-3-2e, RMDP/SCP-AEA-3-3, RMDP/SCP-AEA-3-3a, RMDP/SCP-AEA-3-3b, RMDP/SCP-AEA-3-3d, RMDP/SCP-AEA-3-3e, RMDP/SCP-AEA-3-3f, VCC-4.a-2, VCC-4.b-2, VCC-4.b-3, VCC-4.b-4, VCC-4.c-1, VCC-4.c-2, VCC-4.c-3. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Sections 4.5 and 4.6 of the State-certified EIR and CDFW Findings for additional information.)

- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. The applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. The SEIR included two Modified Project-specific mitigation measures (ES/VCC-MM-BIO-1 and ES/VCC-MM-BIO-2) related to pre-construction surveys and mitigation for two species not included in the State-certified EIR, the glossy snake and crotch bumblebee. The SEIR concludes that impacts to these species would not be significant with implementation of these modified mitigation measures. The SEIR determined that taking into account the mitigation measures already applicable to the Modified Project and ES/VCC-BIO-1 and ES/VCC-

BIO-2, the Modified Project would not result in any new or substantially more severe significant impacts related to biological resources or jurisdictional waters compared to the 2017 Project as analyzed in the State-certified EIR. (See Section 5.02 of the SEIR for additional information.)

- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect on biological resources or jurisdictional waters was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)
- Comments and Summary of Responses to Comments. Comments were received regarding the Modified Project’s potential impacts on oak trees and Biological Resources, each of which was addressed in turn. As described in Response to Comment No. 9-12, potential impacts to oak trees were addressed in detail in Section 5.02, Biological Resources, of the Draft SEIR, which includes an extensive description of existing conditions and impacts of the Modified Project related to oak trees and how these impacts relate to the impacts of 2017 Project as analyzed in the State-certified EIR. As discussed therein, the Modified Project’s impacts would be consistent with the 2017 Project impacts based on natural variability of habitat over time, as the Modified Project would impact fewer individual oak trees but a slightly increased amount of valley oak woodland habitat compared to the 2017 Project. As detailed in the Draft SEIR, with mitigation, the Modified Project would not result in new or substantially more significant impact to oak trees compared to the 2017 Project.

A commenter raised questions about the impact to biological resources based on reference to the “2015 project.” As described in Response to Comment No. 9-9 and No. 9-12 regarding the inapplicability of the 2015 Draft EIR for Entrada South, which entailed a different project with a different design and much larger disturbance area (over 100 acres larger disturbance area for Entrada South compared to the Modified Project), rendering comparisons related to oak tree impacts or other impacts inapplicable and uninformative to the current analysis. The prior project was not pursued and the 2015 EIR was never certified. The comment did not provide any specific deficiencies with the Draft SEIR that can be addressed.

As described in Response to Comment No. 9-13, a commenter questions the Draft SEIR’s analysis and description of jurisdictional waters and claimed the Draft SEIR does not provide specifics related to impacts related to jurisdictional waters. Section 5.02, Biological Resources, of the Draft SEIR includes a detailed description of existing conditions and impacts related to jurisdictional waters and

how these impacts relate to the impacts of the 2017 Project as analyzed in the State-certified EIR. This analysis is supported by the Entrada South Waters Report and VCC Waters Report included as Appendices 5.2c and 5.2d of the Draft SEIR, respectively.

The commenter asserted that the Draft SEIR is “uninformative and confusing throughout.” The commenter also stated “We believe that the Resource Plan, is not sufficient to address project level impacts for the above stated reasons, i.e. it is based on outdated or inapplicable studies and data. Significant new information will substantially change the DEIR’s analyses of the Project’s impacts, alternatives and required mitigation, so these areas must be covered in this new document.” As stated in Response to Comments No. 9-14 and No. 9-35, Topical Response 1 describes the scope of the Draft SEIR and appropriateness of preparing a Draft SEIR to evaluate whether Modified Project results in new environmental impacts compared to the 2017 Project as analyzed in the State-certified EIR. As described in Topical Response 1, the Draft SEIR is a supplemental EIR to the State-certified EIR in accordance with CEQA’s supplement EIR provisions. The Modified Project Site is within the planning boundary of the State-approved Newhall Ranch RMDP/SCP, which was the subject of the State-certified EIR. As described in Section 3.0, Project Description, of the Draft SEIR, the Modified Project as currently proposed reflects minor changes and refinements related to the development of the Entrada South and VCC Planning Areas, as compared to the 2017 Project. The Modified Project provides for continued implementation of the resource management and development activities facilitated by the RMDP/SCP within the Entrada South and VCC Planning Areas. Under CEQA, it is appropriate for a lead agency to proceed under CEQA’s supplemental review provisions (CEQA Guidelines Sections 15162 and 15163) as long as the prior EIR is relevant to the ongoing decision making process and retains some informational value for evaluating the current project. (*Friends of the College of San Mateo Gardens v. San Mateo County Community College Dist.* (2016) 1 Cal.5th 937, 952.) Here, because the State-certified EIR specifically analyzed the residential and commercial development of the Entrada South and VCC Planning Areas, it remains relevant to the Modified Project and contains significant informational value for evaluating the Modified Project such that the County’s decision to proceed under CEQA’s subsequent review provisions is squarely allowed under CEQA. The commenter has not provided evidence that the State-certified EIR is not relevant nor of informational value to the Modified Project.

The California Department of Fish and Wildfire (CDFW) raised comments related to the Biological Resources analysis and mitigation measures, including related to impacts to Crotch’s bumble bee, western burrowing owl, jurisdictional waters, as well as the Worker Environmental Awareness Program. In Responses to Comments No. 2-1 through 2-13, the County responded to and incorporated each of CDFW’s comments and made applicable clarifications to the Biological Resources analysis and mitigation measures in the Final SEIR.

Thus, the comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve “significant new information” triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

C. Cultural Resources

- 2017 Project. The State-certified EIR identified potentially significant impacts to previously undetected unique cultural resources, unique paleontological resources, and human remains. However, the State-certified EIR found that these impacts would be reduced to a less than significant level with the mitigation measures identified in the State-certified EIR. The applicable mitigation measures are RMDP/SCP-CR-3 through RMDP/SCP-CR-6, RMDP/SCP-PR-1 through RMDP/SCP-PR-7. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Section 4.10 of the State-certified EIR and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to historical resources or unique archaeological resources. Thus, no new mitigations measures are required. (See Section 5.03 of the SEIR for additional information.)
- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect on undetected cultural resources was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)

D. Energy

- 2017 Project. The State-certified EIR studied impacts to global climate change and, by necessity (due to the relationship between energy consumption and the release of GHG emissions), considered the energy implications of development within the Entrada and VCC Planning Areas. The State-certified EIR included

numerous mitigation measures to increase the energy efficiency of Project development and thereby reduce energy impacts. The applicable mitigation measures are RMDP/SCP-AEA-2-1, RMDP/SCP-AEA-2-2, RMDP/SCP-AEA-2-3, RMDP/SCP-AEA-2-4, RMDP/SCP-AEA-2-5, RMDP/SCP-AEA-2-6, RMDP/SCP-AEA-2-7, RMDP/SCP-AEA-2-8, RMDP/SCP-AEA-2-9, RMDP/SCP-AEA-2-11, and RMDP/SCP-AEA-2-12. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Section 8 of the State-certified EIR and CDFW Findings for additional information.)

- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to energy compared to the 2017 Project as analyzed in the State-certified EIR. Thus, no new mitigations measures are required. (See Appendix 1, Section 6 of the SEIR for additional information.)
- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect on energy was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)

E. Geology and Soils

- 2017 Project. The State-certified EIR identified potentially significant geology and soils impacts. However, the State-certified EIR concluded that the implementation of applicable mitigation would ensure that geology and geology and soil impacts would be less than significant for the Entrada South and VCC Planning Areas. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Section 4.13 of the State-certified EIR and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Mitigation measures ES/VCC-GEO-1 through ES/VCC-GEO-4 would be implemented under the Modified Project. The SEIR determined

that the Modified Project would not result in any new or substantially more severe significant impacts related to soils and geology compared to the 2017 Project as analyzed in the State-certified EIR. (See Appendix 1, Section 7 of the SEIR for additional information.)

- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect on soils and geology was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)

F. Greenhouse Gas Emissions

- 2017 Project. The State-certified EIR’s analysis of GHG impacts was extensive, which identified a potentially significant impact related to GHG’s. The State-certified EIR’s GHG mitigation framework and analytical methodology was reviewed by the California Air Resources Board (ARB), the state authority on climate policy. ARB determined the State-certified EIR “provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented.” ARB reiterated the same view in a letter to CDFW dated June 7, 2017, indicating the State-certified EIR’s GHG analyses provide an adequate “technical basis for CDFW to find, in its lead agency discretion..., that the project as currently proposed will not result in any net additional greenhouse gas emissions after identified mitigation measures are fully implemented.” Moreover, as highlighted in ARB’s 2017 Climate Change Scoping Plan Update, the 2017 Approved Project evaluated in the State-certified EIR serves as one of “[s]everal recent examples of sustainable land use development projects in California [that] have demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions.” The State-certified EIR process culminated with CDFW’s adoption of a comprehensive GHG mitigation framework to ensure the 2017 Project would achieve net zero GHG emissions, and the State-certified EIR concluded that after mitigation, the 2017 Project’s greenhouse gas emissions would be less than significant. The applicable mitigation measures are RMDP/SCP-AEA-2-1 through RMDP/SCP-AEA-2-13. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Section 8 of the State-certified EIR, Section 2 of the Additional Environmental Analysis, and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or

changed circumstances. Applicable mitigation Measures would continue to be implemented under the Modified Project to achieve net zero GHGs. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to greenhouse gas emissions compared to the 2017 Project as analyzed in the State-certified EIR. Thus, no new mitigations measures are required. (See Appendix 1, Section 8 of the SEIR for additional information.)

- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect on GHG emissions was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)
- Comments and Summary of Responses to Comments. Comments were received requesting the County to consider utilizing local workforce policies for various GHG, transportation, and air quality benefits but the comments did not make specific claims about the Modified Project or the adequacy of the Draft SEIR. As described in Response to Comment No 8-2, as demonstrated in the Initial Study and Section 5.09 Transportation, no new or more substantially severe impacts related to GHG and transportation were identified for the Modified Project as compared to those identified in the State-certified EIR for the 2017 Project. As demonstrated in Section 5.01, Air Quality, with the implementation of mitigation measures and compliance with regulatory standards, the Modified Project would not result in new or substantially more severe significant impacts related to air quality as compared to the 2017 Project in the State-certified EIR. Thus, the Draft SEIR appropriately evaluates impacts to GHGs, air quality, and transportation.

Other comments were made with general assertions about GHG emissions. As described in Response to Comment No. 9-8, The Modified Project is subject to and will implement a comprehensive net-zero GHG emissions mitigation program comprised of 13 binding mitigation measures that were reviewed and certified by the California Air Resources Board (CARB), the state’s leading authority on climate. CARB determined that the project would achieve net-zero GHG emissions based on the mitigation analyzed in the State-certified EIR. Specifically, CARB evaluated the data analysis in the State-certified EIR, and the net-zero GHG mitigation program, and determined that it “will not result in any net additional greenhouse gas emissions.” (See Final SEIR, Letter from Richard Corey, Executive Officer, CARB, to Chuck Bonham, Director, CDFW, June 7, 2017.) Similarly, in findings to the State-certified EIR, CDFW concluded that “[w]ith implementation of Mitigation Measures 2-1 through 2-13, the Project will reduce all Project-related construction and operational GHG emissions to net zero

over the 30-year project life” and “[a]s highlighted in [C]ARB’s draft 2017 Climate Change Scoping Plan Update, the Project serves as one of ‘[s]everal recent examples of sustainable land use development projects in California [that] have demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions.’”⁹

Another comment states that the Draft SEIR “excludes a GHG analysis, instead relying on the Resource Management Plan.” As described in Response to Comment Nos. 9-22 and 9-37, the Draft SEIR utilizes the State-certified EIR’s GHG assessment and mitigation measures which comprise the net zero GHG mandate applicable to the Modified Project, as described above. A detailed GHG analysis for the Modified Project was provided in the Initial Study included as Appendix 1a of the Draft EIR. As discussed therein, the Modified Project would not increase GHG emissions as compared to the 2017 Project, and the Modified Project would continue to achieve net zero GHG emissions based on the mandatory mitigation framework established by the State-certified EIR. The Modified Project is subject to and will implement a comprehensive net-zero GHG emissions mitigation program comprised of 13 binding mitigation measures that were reviewed and certified by CARB, the state’s leading authority on climate. CARB determined that the project would achieve net-zero GHG emissions based on the mitigation analyzed in the State-certified EIR. The GHG mitigation requires the project to design residences, commercial buildings, and public facilities to zero net energy standards, install Level 2 EV charging stations in every residence and throughout the community, implement an extensive Transportation Demand Management Program to reduce vehicle trips, implement a Building Retrofit Program in disadvantaged communities in Los Angeles County, and other GHG reduction measures.

The commenter asserted that the Draft SEIR is “uninformative and confusing throughout.” The commenter also stated “We believe that the Resource Plan, is not sufficient to address project level impacts for the above stated reasons, i.e. it is based on outdated or inapplicable studies and data. Significant new information will substantially change the DEIR’s analyses of the Project’s impacts, alternatives and required mitigation, so these areas must be covered in this new document.” As stated in Response to Comments No. 9-14 and No. 9-35, Topical Response 1 describes the scope of the Draft SEIR and appropriateness of preparing a Draft SEIR to evaluate whether Modified Project results in new environmental impacts compared to the 2017 Project as analyzed in the State-certified EIR. As described in Topical Response 1, the Draft SEIR is a supplemental EIR to the State-certified EIR in accordance with CEQA’s supplement EIR provisions. The Modified Project Site is within the planning boundary of the State-approved Newhall Ranch RMDP/SCP, which was the

⁹ CDFW, Final Actions and Supplemental Findings for Newhall Ranch RMDP/SCP, June 14, 2017, p. 40 (citing to ARB, 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California’s 2030 Greenhouse Gas Target (January 20, 2017 Draft), at p. 135).

subject of the State-certified EIR. As described in Section 3.0, Project Description, of the Draft SEIR, the Modified Project as currently proposed reflects minor changes and refinements related to the development of the Entrada South and VCC Planning Areas, as compared to the 2017 Project. The Modified Project provides for continued implementation of the resource management and development activities facilitated by the RMDP/SCP within the Entrada South and VCC Planning Areas. Under CEQA, it is appropriate for a lead agency to proceed under CEQA's supplemental review provisions (CEQA Guidelines Sections 15162 and 15163) as long as the prior EIR is relevant to the ongoing decision making process and retains some informational value for evaluating the current project. (*Friends of the College of San Mateo Gardens v. San Mateo County Community College Dist.* (2016) 1 Cal.5th 937, 952.) Here, because the State-certified EIR specifically analyzed the residential and commercial development of the Entrada South and VCC Planning Areas, it remains relevant to the Modified Project and contains significant informational value for evaluating the Modified Project such that the County's decision to proceed under CEQA's subsequent review provisions is squarely allowed under CEQA. The commenter has not provided evidence that the State-certified EIR is not relevant nor of informational value to the Modified Project.

Thus, the comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve "significant new information" triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

G. Hazards and Hazardous Materials

- 2017 Project. The State-certified EIR identified potentially significant impacts relative to the following issues within the Entrada South Planning Area: hazards related to the routine use, transport, and disposal of hazardous materials; reasonably foreseeable upset and accident conditions; hazardous emissions or the handling of hazardous materials within 0.25 mile of a school; and wildland fires. The State-certified EIR identified potentially significant impacts relative to the following issues in the VCC Planning Area: hazards related to the routine use, transport, and disposal of hazardous materials; reasonably foreseeable upset and accident conditions; hazardous emissions or the handling of hazardous materials within 0.25 mile of a school; and wildland fires. However, the State-certified EIR concluded that implementation of mitigation measures would reduce these impacts to a less than significant level. The applicable mitigation measures are RMDP/SCP-PH-1, RMDP/SCP-PH-4, RMDP/SCP-PH-6, RMDP/SCP-PH-8, RMDP/SCP-PH-10, RMDP/SCP-PH-11, RMDP/SCP-PH-12, RMDP/SCP-PH-13, RMDP/SCP-PH-14, VCC-PH-1, and VCC-PH-2. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the

environment. (See Section 4.17 of the State-certified EIR and CDFW Findings for additional information.)

- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to hazards or hazardous materials compared to the 2017 Project as analyzed in the State-certified EIR. Thus, no new mitigations measures are required. (See Section 5.04 of the SEIR for additional information.)
- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect on hazards and hazardous materials was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)

H. Hydrology

- 2017 Project. The State-certified EIR concluded that hydrology impacts related to flooding/flood hazards and storm water conveyance within the Entrada South and VCC Planning Areas would be less than significant. Nonetheless, Mitigation Measures RMDP/SCP-HY-1, and RMDP/SCP-HY-3 through RMDP/SCP-HY-7 were adopted to ensure impacts related to flood hazards would remain less than significant with mitigation. In addition, Mitigation Measures VCC-HY-1 through VCC-HY-3 were previously adopted by the County and would apply. The State-certified EIR concluded that the hydraulic impacts on sensitive aquatic/riparian resources in the Santa Clara River Corridor and tributaries due to implementation of the 2017 Project would be less than significant with Mitigation Measures SP 4.2-1 through 4.2-8 and RMDP/SCP-GRR-1 through RMDP/SCP GRR-6. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Section 4.1 and 4.2 of the State-certified EIR and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. The SEIR determined that the Modified Project would not result in any new or

substantially more severe significant impacts related to hydrology compared to the 2017 Project as analyzed in the State-certified EIR. Thus, no new mitigations measures are required. (See Section 5.05 of the SEIR for additional information.)

- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect on hydrology was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)

I. Water Quality

- 2017 Project. The State-certified EIR identified potentially significant impacts relating to surface and groundwater quality. However, the State-certified EIR found that these impacts would be reduced to a less than significant level with the mitigation measures identified in the State-certified EIR. The applicable mitigation measures are RMDP/SCP-WQ-1 and RMDP/SCP-WQ-2. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Section 4.4 of the State-certified EIR and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to water quality compared to the 2017 Project as analyzed in the State-certified EIR. Thus, no new mitigations measures are required. (See Section 5.06 of the SEIR for additional information.)
- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect on water quality was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)

J. Noise

- 2017 Project. The State-certified EIR identified potentially significant noise impacts related to the following areas: exposure of people to noise levels in excess of standards established in the local general plan or noise ordinance, or other applicable standards of other agencies; a substantial permanent increase in ambient noise levels in the Project vicinity; a substantial temporary or periodic increase in ambient noise levels in the Project vicinity; exposure of on site exterior frequent use areas at noise-sensitive receptors to noise levels above normally acceptable levels identified in the State Land Use Compatibility Guidelines utilized by the County (i.e., 60 dBA CNEL for single family, 65 dBA CNEL for multi-family, and 70 dBA CNEL for schools and public parks); exposure of Project occupants to noise levels originating on- or off-site that are above the Los Angeles County Noise Ordinance standards; and exposure of off-site sensitive receptors to a significant increase in noise level from Project-related activities. However, the State-certified EIR concluded that the implementation of applicable mitigation would ensure that noise impacts in these areas would be reduced to less than significant impacts. The applicable mitigation measures are VCC-NOI-1 through VCC-NOI-10. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Section 4.9 of the State-certified EIR and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project's potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. Further, mitigation measures ES/VCC-NOI-1 through ES/VCC-NOI-4 would be implemented under the Modified Project. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to noise. (See Section 5.08 of the SEIR for additional information.)
- Finding. As detailed in the State-certified EIR, the 2017 Project's effect on project-related noise was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)
- Comments and Summary of Responses to Comments. A commenter stated that its noise and vibration expert consultant identified a significant groundborne

vibration impact to the sensitive receptors within the radio studio located 250 feet from potential development at the Project site and 185 feet from potential grading. The commenter proposed alleged feasible mitigation to reduce significant vibration impacts, including coordination between the studio's recording schedules and high-vibration construction activities within a certain buffer zone. For multiple reasons described in Response to Comment No. 7-22, the comment is not correct and the Modified Project would not result in new or substantially more severe significant groundborne vibratory impacts compared to the 2017 Project.

The Draft SEIR appropriately analyzed the construction noise impacts and concluded based on substantial evidence that the Modified Project would not result in a new or substantially more severe significant impacts compared to the 2017 Project. First, the Draft SEIR appropriately analyzed the construction noise impacts and concluded based on substantial evidence that the Modified Project would not result in a new or substantially more severe significant impacts compared to the 2017 Project. Second, the Initial Study for the Draft SEIR considered sensitive receptors located near the Project Site (including as close as 40 feet) and determined that vibration from Modified Project construction activities would be lower than vibration analyzed in the State-certified EIR because the Modified Project does not include pile driving whereas the State-certified EIR assumed that pile driving may occur.

Third, in response to this comment, an analysis was conducted to evaluate the potential for groundborne vibration using the same the methodology outlined in the comment letter (FTA Table 6-14). The analysis demonstrates that the use of vibratory rollers and similar equipment raised in the comment would not introduce a perceptible change in conditions at the building occupied by Grace to You because the existing groundborne noise from roadway traffic is significantly higher than the predicted contribution from construction activities. Thus, the existing intervening roadway noise between Grace for You and the Modified Project construction would effectively mask any contributions from the Modified Project's vibratory roller, ensuring that the Modified Project would not result in an additive or cumulative increase in groundborne vibration levels at this receptor. Therefore, contrary to the commenter's suggestion, no significant groundborne noise impacts will occur at Grace for You from the Modified Project construction and no additional mitigation is required. The comment is not correct about pile driving impacts because the Modified Project will not utilize pile driving.

The commenter asserted that mitigation measure requiring mufflers would not result in further reductions to construction noise. As described in Response to Comment No. 7-23, the Draft SEIR identifies feasible mitigation measures that are consistent with the County's General Plan and industry best practices and are supported by authoritative sources, including the authoritative agency guidance document on noise analysis—the Federal Highway Administration (FHWA) Roadway Construction Noise Handbook. The Draft SEIR follows a well-established methodology consistent with industry best practices and FHWA

guidance that accounts for differences between construction equipment noise levels assumed in the modeling and the real-world noise reductions that are achieved through the use of optimal mufflers. The FHWA Construction Noise Handbook substantiates that properly installed and maintained optimal mufflers provide an additional 10 dBA or more of attenuation compared to construction equipment without optimal mufflers.

The commenter states that “[w]hile mitigation measure NOI-2, a logical arrangement of construction staging and reduction of idling, and mitigation measure NOI-4, a clear channel of communication between the contractor and community, can be good noise-reducing measures, neither would reduce worst-case scenarios of necessary construction closest to sensitive receivers.” As described in Response to Comment No. 7-24, the Draft SEIR qualitatively describes the benefits of these measures (summarized again below and acknowledged by the commenter), and the Draft SEIR concludes conservatively that the Modified Project does not exceed Noise Ordinance numeric thresholds even without quantifying the reductions from these measures. CEQA does not require a quantitative analysis in all cases and a lead agency may qualitatively describe impacts and mitigation where appropriate, as is the case here. This approach ensures that the analysis remains conservative by not assuming noise reductions that cannot be reflected in noise modeling.

Thus, the comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve “significant new information” triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

K. Public Services

- 2017 Project. The State-certified EIR identified potentially significant impacts to public services, including fire protection, sheriff protection, schools, parks, Emergency Medical Services, and libraries. However, the State-certified EIR found that these impacts would be reduced to a less than significant level with the mitigation measures identified in the State-certified EIR. The applicable mitigation measures are RMDP/SCP-PS-1 and VCC-PS-1 through VCC-PS-7. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Appendix 1, Section 15 of the SEIR and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project.

The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to public services. Thus, no new mitigations measures are required. (See Appendix 1, Section 15 of the SEIR for additional information.)

- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect on public services was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)
- Comments and Summary of Responses to Comments. Comments were received regarding the Modified Project’s potential impacts on law enforcement resources and operations. As described more fully in Response to Comment 3-2, the Project Applicant has committed to comply with the Los Angeles County Law Enforcement Facilities Mitigation Fee and/or applicable developer fees as required. The Project Applicant has also incorporated elements of the Crime Prevention through Environmental Design (CPTED) in design plans for the adjacent Mission Village master-planned community (under development) and the Project Applicant plans to include similar elements for the Project, such as:
 - Natural surveillance—Using physical features to increase visibility
 - Access control—Using landscaping, lighting, and fencing to guide people in and out of spaces
 - Territorial reinforcement—Using physical features to establish ownership, such as fences, signage, and lighting
 - Maintenance—Keeping homes, buildings, and communities well-maintained to create a sense of ownership
 - Activity support—Encouraging interaction in public spaces to discourage criminal acts.

Thus, the comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve “significant new information” triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

L. Transportation

- 2017 Project. The State-certified EIR identified potentially significant impacts related to: cause a County roadway segment to go from LOS A through E to LOS F or a Ventura County roadway segment to go from LOS A through D to LOS E; increase the volume-to-capacity (v/c) ratio at an existing deficient condition location by 0.01 or more; or cause or contribute to a v/c of greater than 1.0 and increase the v/c by 0.020 or more. However, the State-certified EIR found that these impacts would be reduced to a less than significant level with the mitigation measures identified in the State-certified EIR. The applicable mitigation measures are RMDP/SCP-TR-5, RMDP/SCP-TR-7, RMDP/SCP-TR-8, RMDP/SCP-TR-10 through RMDP/SCP-TR-18 and VCC-TR-1 through VCC-TR-19. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Section 4.8 of the State-certified EIR and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project's potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to transportation. Thus, no new mitigations measures are required. (See Section 5.09 of the SEIR for additional information.)
- Finding. As detailed in the State-certified EIR, the 2017 Project's effect on transportation was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)

M. Vehicle Miles Traveled (VMT) (Informational)

- 2017 Project. The State-certified EIR analyzed transportation impacts of the 2017 Project with an LOS-based methodology. Mitigation measure RMDP/SCP-AEA-2-6 applied to the 2017 Project as a GHG reduction measure but it also has the benefit of reducing VMT through the implementation of a Transportation Demand Management program.
- Modified Project. Adoption of CEQA Guidelines Section 15064.3(c) does not constitute new information requiring a VMT-based analysis for the Modified

Project. Nevertheless, a VMT analysis was performed for the Modified Project. The SEIR determined that the Modified Project would not generate more than 110 trips per day in comparison to the 2017 Project as analyzed in the State-certified EIR. Therefore, the Modified Project would meet the trip generation screening criteria and is presumed to have a less than significant VMT impact based on the County VMT Guidelines and would not require further VMT analysis. Nevertheless, additional VMT analysis was performed for the Modified Project. Mitigation measure RMDP/SCP-AEA-2-6 would continue to be implemented under the Modified Project. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to VMT. Thus, no new mitigations measures are required. (See Section 5.09 of the SEIR for additional information.)

- Finding. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect on VMT as compared to the 2017 Project. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)
- Comments and Summary of Responses to Comments. A comment was received that ES/VCC-PDF-TR-1 was improperly relied upon as a mitigation measure rather than a project design feature. As detailed in Response to Comment No. 8-16, the Draft SEIR correctly determined that construction-related trips would not result in a new or substantially more severe significant impact compared to the 2017 Project without considering ES/VCC-PDF-TR-1. Nevertheless, the Modified Project includes Project Design Feature ES/VCC-PDF-TR-1 as a commitment above regulatory requirements to further minimize construction trip interference during construction as an additional environmental benefit compared to the 2017 Project. Thus, the comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve “significant new information” triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

N. Tribal Cultural Resources

- 2017 Project. The State-certified EIR identified potentially significant impacts to cultural resources, including examples of the major periods of California history and interred human remains. Nonetheless, the State-certified EIR outlined mitigation measures, including RMDP/SCP-CR-3 through RMDP/SCP-CR-6

which specify avoidance, monitoring, and data recovery requirements to be carried out by a qualified archaeologist and Native Americans. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Section 4.10 of the State-certified EIR and CDFW Findings for additional information.)

- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to tribal cultural resources. Thus, no new mitigations measures are required. (See Section 5.10 of the SEIR for additional information.)
- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect on cultural resources was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)
- Comments and Summary of Responses to Comments. A comment was received that the Modified Project is located outside of Serrano ancestral territory and as such, the Yuhaaviatam of San Manuel Nation will not be requesting to receive consulting party status. The comment was noted for the record and no revisions were made to the Draft SEIR. Thus, the comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve “significant new information” triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

O. Solid Waste

- 2017 Project. The State-certified EIR identified potentially significant solid waste impacts resulting from the development of the Entrada South and VCC Planning Areas. However, the State-certified EIR concluded that such impacts would be reduced to a less than significant level with implementation of mitigation measures. The applicable mitigation measures are RMDP/SCP-SWS-1 and VCC-

SWS-1. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Section 4.9 of the State-certified EIR and CDFW Findings for additional information.)

- Modified Project. The SEIR evaluated the Modified Project's potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to Solid Waste. Thus, no new mitigations measures are required. (See Section 5.13 of the SEIR for additional information.)
- Finding. As detailed in the State-certified EIR, the 2017 Project's effect on solid waste was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)

P. Wildfire

- 2017 Project. The State-certified EIR identified potentially significant impacts related to wildfire. However, the State-certified EIR found that these impacts would be reduced to a less than significant level with the mitigation measures identified in the State-certified EIR. The applicable mitigation measures are RMDP/SCP-PH-7 and RMDP/SCP-PH-14. Accordingly, CDFW found that changes or alterations have been required in, or incorporated into, the 2017 Project which avoid or substantially lessen the significant effects on the environment. (See Section 4.17 of the State-certified EIR and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project's potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. Applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. The SEIR determined that the Modified Project would not result in any new or substantially more severe significant impacts related to wildfire. Thus, no new mitigations measures are required. (See Section 5.14 of the SEIR for additional information.)

- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect on wildfires was reduced to a less than significant level with mitigation. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)
- Comments and Summary of Responses to Comments

During the public comment period, comments were received that claimed the Draft SEIR’s analysis of wildfire was deficient but only generally referred to the Draft SEIR and inclusion of proposed Project Design Features. As described in Response to Comment No. 8-12, Section 5.14, Wildfire, of the Draft SEIR includes a detailed regulatory setting and analysis of potential wildfire impacts using current state and local methodology. As discussed therein, like the 2017 Project as described in the State-certified EIR, potential on-site and off-site wildfire impacts resulting from the Modified Project would be less than significant with regulatory compliance and mitigation implemented under the oversight of Los Angeles County Fire.

The Draft SEIR included a comprehensive description and analysis of potential wildfire risks, including an extensive Fire Protection Plan and Evacuation Plan prepared by Dudek, experts on wildfire risk and mitigation (Appendices 5.14a and 5.14b to the SEIR, respectively). The Draft SEIR and Fire Protection Plan include detailed discussions and analysis of the applicable regulatory requirements, mitigation measures in the State-certified EIR, benefits of modern fire-resistant building code and fuel management standards adopted since the certification of the State-certified EIR, wildfire modeling specific to the Modified Project that estimates both onsite and offsite wildfire risk (including during extreme wind events), and other topics.

As described in Section 5.14 Wildfire of the Draft SEIR, the Modified Project does not include modifications to the 2017 Project that would exacerbate wildfire risks compared to those identified in the State-certified EIR for the 2017 Project:

- As with the 2017 Project, the Modified Project Site is surrounded by existing and planned development. There is substantial development near the Entrada South Planning Area, including I-5 to the east, Six Flags Magic Mountain theme park and SR-126 to the north, the existing Mission Village community to the west, and the existing Westridge community to the south, along with secondary road infrastructure to the south, east, and north. Similarly, the VCC Planning Area is surrounding by I-5 to the east, State Route 126 to the south, and the existing approved Valencia Commerce

Center to the north and west. The surrounding development reduces the risk of both encroaching fires and off-site fire spread during construction and operations.

- The Modified Project does not introduce construction activities, land uses or operational features that substantially increase the risk of initiating fires or facilitating wildfire spread compared to the 2017 Project.
- The Modified Project would not increase vehicle trips compared to the 2017 Project and, therefore, would not increase the potential for vehicle-related ignitions.
- With 151 fewer proposed residential units than the 2017 Project, the Modified Project would not introduce a greater number of new residents to a Very High Fire Hazard Severity Zone or the Wildland Urban Interface (WUI) or increase ignition sources associated with new residents compared to the 2017 Project.

Based on the extensive analysis and substantial evidence in the Draft SEIR and supporting Fire Protection Plan and Evacuation Plan, the Draft SEIR appropriately demonstrates that the Modified Project does not result in new or substantially more severe significant construction impacts, operational impacts, or cumulative impacts compared to the 2017 Project, summarized next.

Construction—Section 5.14 Wildfire of the Draft SEIR explained that the Modified Project’s construction activities would be substantially similar to the 2017 Project’s construction activities, and the Modified Project would continue to comply with regulatory requirements and Mitigation Measures RMDP/SCP-PH-7 and RMDP/SCP-PH-14 identified in the State-certified EIR, under the oversight of Los Angeles County Fire. The State-certified EIR determined that the 2017 Project would have a less-than-significant wildfire impact during construction with regulatory compliance and mitigation.

As with the 2017 Project, the Modified Project would comply with County Fire and California Fire Code, requirements for construction activities, which require a variety of measures to reduce fire risk. For example, as with the 2017 Project, the Modified Project will comply with Section 326.12.1 of the County Fire Code, which prohibits the use or operation of any construction equipment, engine, machinery, or any steam, oil, or gasoline-operated stationery or mobile equipment, from which a spark or fire may originate unless such equipment is provided with a qualified device or spark arrester installed in or attached to the exhaust pipe which will prevent the escape of fire or sparks. The Modified Project will also comply with Chapter 33 of the California Fire Code, which obligates the Modified Project to satisfy various standards that limit ignitions, such as prohibiting smoking except in approved areas, preventing the accumulation of and removing combustible debris, implementing fire watch personnel per County Fire guidance, providing on-site water supplies, maintaining vehicle access for firefighting to all construction and demolition area, and other measures.

The Draft SEIR appropriately demonstrates that the Modified Project would not result in a new or substantially more severe significant impacts compared to the 2017 Project based on regulatory compliance and mitigation, without considering Project Design Features. In addition, the Draft SEIR describes how the Modified Project includes Project Design Features that would further enhance wildfire safety during construction compared to the 2017 Project:

- Under PDF-WF-1, prior to any construction activities, a detailed Construction Fire Protection Plan (included as Appendix 5.14c of the Draft SEIR) will be implemented to impose fire watch during hot works and heavy machinery activities, spark arresters on all equipment, water supply via hose lines attached to hydrants, red flag period restrictions, and other fire reduction measures.
- Under PDF-WF-2, prior to bringing lumber or combustible materials related to building construction onto the Modified Project Site, site improvements within the active development area must be in place, including utilities, operable fire hydrants, and an approved, temporary roadway surface and fuel modification zones. Combustible materials would only be utilized on-site prior to these stated site improvements as needed for providing the improvements themselves (e.g., wood forms for cast-in-place concrete).

Accordingly, the Draft SEIR properly analyzes and discloses wildfire risk during construction.

Operations—Section 5.14 Wildfire of the Draft SEIR describes how, as with the 2017 Project, the Modified Project would comply with applicable regulations and Mitigation Measures RMDP/SCP-PH-7 and RMDP/SCP-PH-14 identified in the State-certified EIR, under the oversight of Los Angeles County Fire. The Modified Project is subject to the current versions of the California Fire Code, California Building Code, and County Fire requirements, which are more stringent than the regulatory requirements at the time of the State-certified EIR.

Under modern code standards covering the Modified Project, new structures (residences, commercial buildings, public facilities, etc.) must be fire-hardened to decrease flammability, reduce ignition potential, and inhibit fire spread. These standards require, among many other measures described in the Draft SEIR and Fire Protection Plan, fire-resistant roofing to resist ignition from embers or building-to-building fires, vent covering and opening limitations to avoid ember intrusion, noncombustible or ignition-resistant exterior walls, ignition-resistant eaves, and porch ceilings, insulated windows and exterior doors, fire-resistant exterior decks and walkways, and ignition-resistant under-flooring and appendages.

The Draft SEIR and Fire Protection Plan explain that, in addition to fire hardening, regulatory requirements obligate the Modified Project to implement and maintain fuel modification zones (or FMZs) to buffer the development from encroaching fire and reduce the risk of off-site fire spread. An FMZ is a strip of land where combustible vegetation has been removed

and/or modified and partially or totally replaced with more adequately spaced, drought-tolerant, low fuel volume plants in order to provide a reasonable level of protection to structures from wildland fire. The Modified Project will comply with standards in Public Resources Code and County Fire requirements to provide FMZs of at least 100 feet.

As presented in the Draft SEIR and Fire Protection Plan, modeling demonstrates that encroaching wildfires would not present a significant risk of directly intruding into the Modified Project even during extreme events (e.g., strong Santa Ana winds). Even if windblown embers were to fly over the FMZs, the ignition-resistant buildings and fire-resistant landscaping would minimize the likelihood of any fires starting on-site, and even if isolated fires occurred, they would be unlikely to spread quickly or be of high intensity given the limited fuel sources. The Modified Project does not include modifications that would increase airborne embers relative to the 2017 Project. On-site embers would most likely originate from a structure fire. The same fire-hardening and FMZ requirements that would protect structures and residents of the Modified Project would also reduce the likelihood of a structure fire occurring and embers migrating off the Modified Project Site. Because on-site fires are unlikely to occur and any ignitions would likely be low-intensity fires due to lack of fuel sources, the Modified Project would not exacerbate the production of embers that could fly across the FMZ areas to surrounding areas.

These fire-hardening and FMZ wildfire protective measures have proven to substantially reduce the risk of buildings catching fire or spreading fires during a wildfire event, particularly when integrated into a master-planned community such as the Modified Project. As documented in the Draft SEIR and Fire Protection Plan, modern, master-planned communities have proven to be very resistant to wildfire risks without suffering substantial structural loss.

For these reasons, the Draft SEIR demonstrates that the Modified Project will not result in new or substantially more severe significant impacts compared to the 2017 Project with regulatory compliance and applicable mitigation identified in the State-certified EIR, before taking into account any benefits from Project Design Features. In addition, the Draft SEIR described how the Modified Project's Project Design Features provide additional fuel reduction benefits. Under PDF-WF-3 and PDF-WF-4, the FMZs must be funded, maintained, and inspected for the life of the Modified Project. PDF-WF-5 helps reduce the risk of human-caused ignitions in the area by educating residents about wildfire risks and safety. Accordingly, the Draft SEIR properly analyzes and discloses wildfire risk during operations.

Recent Fires in Los Angeles County—A public comment references the 2025 fires in Los Angeles County, including “the Hurst Fire, the Castaic Fire, and the Lidia Fire that were located in and around the Santa Clarita Valley,” and states the Draft SEIR’s analysis of “risk falls well short,” but the comment does not provide any specific critique of or contrary evidence to the Draft SEIR’s extensive wildfire analysis. In addition to the detailed analysis described above, the Draft SEIR and the Fire Protection Plan provide an extensive analysis and disclosure of recent wildfires, including wildfires where Santa Ana Winds, high winds, and dry conditions contributed to wildfire

damage. Based on this analysis, the Draft SEIR demonstrates that new, master-planned communities meeting the latest fire-code standards, and fuel management requirements under the oversight of Los Angeles County Fire, such as the Modified Project, are highly resistant to wildfires.

In response to public comment, the Final SEIR and Section 3.9 of the Fire Protection Plan were updated with additional data about the 2025 fires in Los Angeles County. The Fire Protection Plan supports that new homes built as part of a new, master-planned, wildfire-resilient community have performed far better than older homes during recent California wildfires. When fire hardening of individual structures is coupled with fuel modification zones and community-level buffers, the features enhance the community's overall wildfire resilience, which, in turn, reduces the risk of structure-to-structure ignition and reduces risks from flying embers, both onsite and offsite. The Final SEIR and Fire Protection Plan explain that new master-planned communities in very high fire severity zones within the County, such as the Modified Project, are planned, approved and implemented with numerous fire-safety features and measures under the oversight of Los Angeles County Fire, such as:

- Fire-hardened homes built to the latest CBC Chapter 7A standards
- Community-wide fuel breaks, fire-resistant landscaping, and green belting
- Perpetual funding, maintenance and enforcement through an HOA
- Appropriate and reliable fire access and evacuation routes
- Adequate water supplies (studied pursuant to SB 610)
- Residential fire sprinklers
- Undergrounded project utilities
- Community design and siting to minimize fire risks (e.g., slope setbacks)

Off-Site Ignition Risk and Offsite Embers—The Draft SEIR and Section 5 of the Fire Protection Plan evaluated whether the Modified Project would result in off-site fire risks, contribute to offsite ignitions, or exacerbate offsite ember casting. The State-certified EIR also analyzed the potential for development of the Entrada South and VCC Planning Areas to cause off-site impacts related to wildland fires. The State-certified EIR determined that the 2017 Project would not result in significant off-site impacts.

As described in the Draft SEIR and Fire Protection Plan, the Modified Project would not increase off-site ignition risk compared to the 2017 Project, and the Modified Project's PDFs would result in a further reduction of off-site ignition risks compared to the 2017 Project based on

enhanced regulatory requirements and design features. The same fire-hardening and fuel modification zones requirements (described above) that would protect structures and residents of the Modified Project would also reduce the likelihood of a structure fire occurring and embers migrating off the Modified Project Site. Fuel modification zones have been shown to lower ember cast and have a shadow effect on the untreated landscape by reducing the probability of burning and the potential fire size. Because on site fires are unlikely to occur and, even if so, would likely be low-intensity fires due to lack of fuel sources, the Modified Project would not significantly exacerbate the production of embers that could fly across the fuel modification zones to surrounding areas.

The BehavePlus modeling completed specifically for the Modified Project, as discussed in the Draft SEIR and the Fire Protection Plan, demonstrates that even if isolated on-site fires occurred at the Modified Project site, they would be unlikely to spread quickly or be of high intensity given the limited fuel sources to spread outward across the fuel modification zones. The BehavePlus modeling demonstrates that approaching fires would be rebuffed or substantially reduced in size and intensity before reaching the inner portions of the FMZs and the structures of the Modified Project. Based on the predicted flame lengths and intensities following implementation of the FMZs, encroaching wildfires would not present a significant risk of directly intruding into the Modified Project even during extreme events (e.g., strong Santa Ana winds). Even if windblown embers were to fly over the FMZs, the ignition-resistant buildings and fire-resistant landscaping would minimize the likelihood of any fires starting on-site, and even if isolated fires occurred, they would be unlikely to spread quickly or be of high intensity given the limited fuel sources. Thus, the Modified Project, once developed, would not facilitate wildfire spread and would reduce estimated flame lengths of approaching wildfires to levels that would be manageable by existing firefighting resources.

Similarly, BehavePlus modeling demonstrates that if a fire were to start on the Modified Project Site, the fire would likely remain manageable and be addressed by the identified firefighting resources due to the ignition-resistant landscapes and structures, along with the perimeter FMZs which are designed to both protect the Modified Project and minimize the likelihood that an on-site fire could escape offsite. As such, the Modified Project's FMZs, fire-hardened structures, and ignition-resistant landscaping would provide protection to both on-site structures and off-site areas, addressing risks related to offsite ignitions and offsite ember casting.

The Draft SEIR concludes that the Modified Project would not result in new or substantially more severe significant impacts regarding offsite wildfire risk compared to the 2017 Project. In addition, the Draft SEIR describes additional environmental benefits provided by the Modified Project's wildfire PDFs:

- Pursuant to PDF-WF-1, prior to any construction activities, a detailed Construction Fire Protection Plan will be submitted to County Fire for review and approval (see Appendix 5.14c for the Construction Fire Protection Plan). The Construction Fire Protection Plan

identifies fire safety measures to reduce the possibility of fires during construction activities, including fire watch during hot works and heavy machinery activities, spark arresters on all equipment, water supply via hose lines attached to hydrants (or a water tender pursuant to County Fire requirements), red flag period restrictions, and mandatory on-site fire resources. The Construction Fire Protection Plan requires employees to receive fire prevention training, which would consist of review of the Modified Project's relevant regulatory requirements and fire safety provisions, review of OSHA Fire Protection and Prevention procedures, proper response and notification of a fire, and the use of fire extinguishing equipment. In addition to reducing on-site fire risks, PDF-WF-1 and PDF-WF-2 would reduce the risk of a fire that began on the Modified Project Site during construction from migrating off-site.

- PDF-WF-2 requires that prior to bringing lumber or combustible materials related to building construction onto the Modified Project Site, site improvements within the active development area must be in place, including utilities, operable fire hydrants, and an approved, temporary roadway surface and fuel modification zones. Combustible materials would only be utilized on-site prior to these stated site improvements as needed for providing the improvements themselves (e.g., wood forms for cast-in-place concrete). These pre-construction improvements would further reduce both onsite and offsite risks from a fire starting or spreading.
- Under PDF-WF-3 and PDF-WF-4, the FMZs must be funded, maintained, and inspected for the life of the Modified Project. PDF-WF-5 helps reduce the risk of human-caused ignitions in the area by educating residents about wildfire risks and safety.

In sum, the Modified Project's fire-hardening of buildings, fuel management zones, and other wildfire measures have proven to substantially reduce the risk of buildings catching fire or spreading fires during a wildfire event, particularly when integrated into a master-planned community such as the Modified Project, reducing both onsite and offsite fire risk, thereby minimizing the risk of offsite ignitions or offsite ember casting during construction and operations.

Attorney General Guidance—As described in the Draft SEIR and the Fire Protection Plan (Appendix 5.14a to the Draft SEIR), in October 2022, the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA. The Guidance is intended to provide guidance for evaluating potential wildfire and evacuation impacts associated with a proposed project under CEQA and to facilitate project design to reduce or mitigate wildfire, evacuation, or emergency access impacts. The Fire Protection Plan includes a detailed description of the Modified Project's consistency with the Attorney General Guidance.

SEIR Appropriately Describes and Incorporates Wildfire Project Design Features—The Draft SEIR appropriately includes a comprehensive analysis of wildfire risks, mitigation, and regulatory compliance. The Draft SEIR concludes that the Modified Project will not result in new

or substantially more severe significant impacts compared to the 2017 Project, *prior to* considering the benefits of the wildfire PDFs. The Draft SEIR appropriately analyzed and disclosed wildfire risks before accounting for the additional benefits of the wildfire PDFs.

The comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve “significant new information” triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

VI. SIGNIFICANT AND UNAVOIDABLE IMPACTS

The following impacts of the 2017 Project were determined in the State-certified EIR to significant and unavoidable. The SEIR did not identify any new or substantially more severe significant impacts for the Modified Project related to these categories of impacts.

A. Aesthetics

- 2017 Project. The State-certified EIR concluded that the 2017 Project’s development of the Entrada Planning Area had the potential to result in significant visual impacts. Specifically, impacts with regard to views (scenic vistas), aesthetics (visual character), and light and glare were determined to be significant. The State-certified EIR evaluated various alternatives and mitigation measures to reduce the potential effects on the environment. Even with the implementation of all feasible mitigation and alternatives as described in the State-certified EIR, the State-certified EIR concluded that impacts to views (scenic vistas), aesthetics (visual character), and light and glare would be significant and unavoidable. The applicable mitigation measures are RMDP/SCP-VR-1 and RMDP/SCP-VR-2. CDFW found that although changes and alterations were incorporated into project design, and mitigation measures have been adopted to substantially avoid or mitigate significant environmental effects, effects would remain significant and unavoidable. CDFW determined that the significant visual resources effects are acceptable because of specific overriding economic, legal, social, and technological considerations, as well as Project benefits. (See Section 4.15 of the State-certified EIR and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. As described in the Project Description, Section 3.0 of the Draft SEIR, the Modified Project would not increase the general scope and intensity of development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area and permanent disturbance

impacts. The Modified Project would reduce the impacts to aesthetic resources further by preserving additional open space and habitat through the avoidance of permanent impacts to Unnamed Canyon 2 within the Entrada Planning Area. Further, applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. As a result and reasons described in the Draft SEIR, the SEIR determined that the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts related to aesthetics compared to the 2017 Project as analyzed in the State-certified EIR. Thus, no new mitigation measures are required. (See Appendix 1, Section 1 of the SEIR for additional information.)

- Finding. As detailed in the State-certified EIR, the 2017 Project's effect on visual resources remained significant and unavoidable even with the application of all feasible mitigation measures and alternatives. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR and SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)
 - 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 State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(3); Pub. Resources Code, § 21081(a)(3); 14 Cal. Code Regs. § 15163(e).)

B. Agriculture

- 2017 Project. The State-certified EIR determined that the 2017 Project's development of the VCC Planning Area the potential to result in significant agricultural impacts related to the conversion of prime farmland, unique farmland, or farmland of statewide importance (farmland). The State-certified EIR evaluated various alternatives and mitigation measures to reduce the potential effects on the environment. Even with the implementation of all feasible mitigation and alternatives, the State-certified EIR concluded that impacts to agriculture would be significant and unavoidable. The applicable mitigation measures are RMDP/SCP-AG-1 and RMDP/SCP-AG-2. CDFW found that although changes and alterations as described in the State-certified EIR were incorporated into project design, and mitigation measures have been adopted to substantially avoid or mitigate significant environmental effects, effects would remain significant and unavoidable. CDFW determined that the significant visual resources effects are acceptable because of specific overriding economic, legal, social, and

technological considerations, as well as Project benefits. (See Section 4.12 of the State-certified EIR and CDFW Findings for additional information.)

- Modified Project. The SEIR evaluated the Modified Project's potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. As described in the Project Description, Section 3.0 of the Draft SEIR, the Modified Project would not increase the general scope and intensity of construction or development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area and permanent disturbance impacts. Further, applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. As a result and for the reasons described in the Draft SEIR, the SEIR determined that the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts related to agriculture compared to the 2017 Project as analyzed in the State-certified EIR. Thus, no new mitigations measures are required. (See Appendix 1, Section 2 of the SEIR for additional information.)
- Finding: As detailed in the State-certified EIR, the 2017 Project's effect on agriculture remained significant and unavoidable even with the application of all feasible mitigation measures and alternatives. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR and SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)
 - 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 State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(3); Pub. Resources Code, § 21081(a)(3); 14 Cal. Code Regs. § 15163(e).)

C. Air Quality

- 2017 Project. The State-certified EIR determined that construction of the 2017 Project would result in significant impacts caused by exceeding the daily emissions thresholds for volatile organic compounds (VOC), nitrogen oxides (NOX), respirable particulate matter (PM10), and fine particulate matter (PM2.5). Additionally, the State-certified EIR determined that operation of the 2017 Project could result in significant impacts related to exceeding the thresholds of significance for VOC, NOx, CO, PM10, and/or PM2.5 in both winter and summer conditions. Finally, the State-certified EIR concluded that the 2017 Project could

result in significant impacts caused by emissions that exceed Localized Significance Thresholds for PM10, PM 2.5, and NO2 at sensitive receptors. The State-certified EIR evaluated various alternatives and mitigation measures to reduce the potential effects on the environment. The applicable mitigation measures are RMDP/SCP-AQ-1 through RMDP/SCP-AQ-16, VCC-AQ-1, and VCC-AQ-2. Even with the implementation of all feasible mitigation and alternatives as described in the State-certified EIR, the State-certified EIR concluded that air quality impacts would remain significant and unavoidable. CDFW found that although changes and alterations were incorporated into project design, and mitigation measures have been adopted to substantially avoid or mitigate significant environmental effects, effects would remain significant and unavoidable. CDFW determined that the significant air quality effects are acceptable because of specific overriding economic, legal, social, and technological considerations, as well as Project benefits. (See Section 4.7 of the State-certified EIR and CDFW Findings for additional information.)

- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. As described in the Project Description, Section 3.0 of the Draft SEIR, the Modified Project would not increase the general scope and intensity of construction or development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area and permanent disturbance impacts. Further, applicable mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project and equipment associated with the Modified Project would be cleaner than considered in the State-certified EIR due to enhanced emissions standards over time. As a result and for the reasons described in the Draft SEIR, the SEIR determined that the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts related to air quality compared to the 2017 Project as analyzed in the State-certified EIR. Thus, no new mitigations measures are required. (See Section 5.01 of the SEIR for additional information.)
- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect on air quality remained significant and unavoidable even with the application of all feasible mitigation measures and alternatives. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:
 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR and SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)
 - 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 State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(3); Pub. Resources Code, § 21081(a)(3); 14 Cal. Code Regs. § 15163(e).)

- Comments and Summary of Responses to Comments. A comment raised concerns about ongoing air quality and health risk issues associated with Chiquita Canyon landfill. As described in Response to Comment No. 9-25, any such conditions are part of the existing conditions reflected in the Draft SEIR's analysis and the Modified Project does not relate to or exacerbate any such activities or events at the landfill. The commenter has not provided any evidence to the contrary. CEQA does not require the analysis of existing environmental conditions on a project if the project does not exacerbate those conditions. In any instance, the Regional Water Quality Control Board is regulating clean up activities at the landfill, along with multiple other regulatory agencies, and the VCC Planning Area is approximately 1 mile east of the landfill and the Entrada South Planning Area is approximately 2.75 miles south of the landfill, both well outside the range of a localized air quality or health risks analysis. As described in Response to Comment No. 9-25, air quality conditions in the vicinity of the landfill are consistent with air quality in the region and there is no evidence of exceedances from the landfill impacting the Modified Project Site.

Comments asserted that additional health risk assessments were needed. As described in Response to Comment No. 7-14, the Draft SEIR includes a detailed analysis of air quality and health risk impacts and is supported by an expert technical report attached as Appendix 5.1 (Air Quality Report) of the Draft SEIR. The Draft SEIR appropriately accounted for the referenced NOP comment letter from SCAQMD by documenting that the Modified Project does not propose residences or other sensitive receptors within 500 feet of Interstate 5 or any other freeway. The State-certified EIR completed a comprehensive health risk assessment and did not identify any significant health risks caused by construction activities, particularly diesel particulate emissions from construction equipment and trucks. Specifically, State-Certified SEIR Appendix 4.7e, Section 3.0, Tables 1-5, and Tables 7-8, summarize the results of the State-certified EIR's health risk analysis. The results of the State-certified EIR's health risk analysis showed that health risk impacts were less than significant.

In addition, the Draft SEIR evaluated health risks from the Modified Project. As described on Draft SEIR, p. 5.1-60, the total construction emissions from the Modified Project would not increase compared to the emissions reported in the State-certified EIR and, as demonstrated above, construction emissions would be lower than those disclosed in the State-certified EIR due to improved vehicle fleets regulations and implementation of the PDFs for the Modified Project. The Draft SEIR concluded health risk impacts would be the same or lower than what

was disclosed in the State-certified EIR because construction-related health risks are proportional to construction emissions (primarily DPM emissions); therefore, the Modified Project would not result in a new significant health risk impact compared to the 2017 Project.

Comments were made that the Modified Project's Project Design Features were included to reduce significant impacts to less than significant levels, but that is not correct. As described in Response to Comment Nos. 8-9 and 8-14, the Draft SEIR did not rely upon ES/VCC-PDF-AQ-1 through ES/VCC-PDF-AQ-7 to reach the conclusion that the Modified Project will not result in new or substantially more severe significant air quality impacts as compared to the 2017 Project. The Draft SEIR's analysis first concluded that the Modified Project, without the incorporation of any PDFs, will not increase emissions compared to the 2017 Project. The PDFs incorporated into the Modified Project provide additional environmental benefits compared to the 2017 Project but are not necessary to mitigate a new or substantially more severe significant environmental impact of the Modified Project.

A commenter alleged that the DSEIR does not analyze emissions associated with the use of generators during construction and that such emissions would result in new significant impacts. As described in Response to Comment No. 7-19, first, the comment raises speculative impacts without specificity for the Modified Project that does not require additional analysis. Second, the comment does not account for the conservative approach to modeling air quality emissions based on the SCAQMD-recommended model, which applies assumptions and emissions factors based on representative projects in the region to consistently and reliably estimate emissions for different projects. The SCAQMD-recommended URBEMIS2007 was used in the State-certified EIR (the SCAQMD-recommended model at that time) and CalEEMod was used for the Draft SEIR. These models were established by the California Air Pollution Control Officers Association (CAPCOA) to provide a basis for land use projects to estimate emissions.

Third, Mitigation Measure RMDP/SCP-AQ-7 requires "Use on-site electricity or alternative fuels rather than diesel-powered or gasoline-powered generators, to the extent feasible." Mitigation Measure RMDP/SCP-AQ-7 was included in the State-certified EIR and is *not* new information. Mitigation Measure RMDP/SCP-AQ-7 is included in the MMRP and is binding on the Modified Project, as enforced by the County. The site is surrounded by development and power supplies are readily available. Consistent with Mitigation Measure RMDP/SCP-AQ-7, the Project Applicant expects that on-site electricity will be used exclusively instead of diesel powered generators except, possibly, in rare events when power outages occur yet construction remains ongoing. The likelihood of

such an event is highly speculative and rare, meaning even if it were to occur, the associated emissions would be very sporadic and relatively low compared to the conservative analysis included in the State-certified EIR and Draft SEIR. Thus, even if the assumptions in this comment are applied, the comment would not change the Draft SEIR's analysis that the Modified Project's construction emissions would not result in new or substantially more severe significant impacts compared to the 2017 Project.

Lastly, the comment that Mitigation Measure RMDP/SCP-AQ-7 is unenforceable is not correct. Mitigation Measure RMDP/SCP-AQ-7 was included in the State-certified EIR and is not new information. Contrary to the comment, Mitigation Measure RMDP/SCP-AQ-7 is described in Section 5.1 of the Draft SEIR and included in the MMRP (Appendix 2 of the Draft SEIR). The County has enforcement authority over the MMRP and will ensure compliance with Mitigation Measure RMDP/SCP-AQ-7, as described in Topical Response No. 1 of the Final SEIR.

Relatedly, the commenter asserted that the Draft SEIR did not properly take into account the use of diesel generators during Power System Power Shutoffs (PSPS). As described in Response to Comment No. 7-12, the comment raises speculative impacts for the proposed uses that do not require analysis under CEQA; however, even if emergency generators are assumed consistent with this comment, the Modified Project would not increase emissions compared to the 2017 Project and therefore would not result in a new or substantially more severe significant impact. Even using the commenter's assumptions about PSPS does not support their claims. The Modified Project includes 151 fewer dwelling units than assumed for Entrada South and VCC in the State-certified EIR. The CARB report issued in 2020 as referenced in the comment states that one in eight households in California owns a generator.¹⁰ For purposes of this analysis, we will assume this generator presence. The Modified Project will reduce the number of residential units and thus, this would result in 18 fewer generators at the Project Site using the CARB's assumption. Assuming that each of these residential generators is a 50 hp (37 kW) diesel unit that will comply with USEPA Tier 4 Emissions

¹⁰ CARB. Emission Impact: Additional Generator Usage Associated with Power Outage. 2020. Available at:https://ww2.arb.ca.gov/sites/default/files/2020-01/Emissions_Inventory_Generator_Demand%20Usage_During_Power_Outage_01_30_20.pdf

Standards,¹¹ this reduction in residential generators could result in the *emissions reductions* shown in Response to Comment No. 7-12.

Thus, the comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve “significant new information” triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

D. Noise

- 2017 Project. The State-certified EIR identified significant and unavoidable cumulative operational traffic noise impacts along 11 roadway segments based on full buildout of the 2017 Project (not limited to the Entrada South and VCC Planning Areas). The State-certified EIR evaluated various alternatives and mitigation options to reduce the potential effects on the environment. The State-certified EIR determined that no feasible mitigation measures or alternatives would reduce the impact to less than significant levels. CDFW determined that the significant cumulative noise effects are acceptable because of specific overriding economic, legal, social, and technological considerations, as well as Project benefits. (See Section 4.9 of the State-certified EIR and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. As described in the Project Description, Section 3.0 of the Draft SEIR, the Modified Project would not increase the general scope and intensity of development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area and permanent disturbance impacts. The Modified Project would not increase vehicle trips compared to the 2017 Project. As a result and for the reasons described in the Draft SEIR, the SEIR determined that the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts related to noise compared to the 2017 Project as analyzed in the State-certified EIR. Thus, no new mitigation measures related to the previously identified noise significant impact are required. (See Section 5.08 of the SEIR for additional information.)
- Finding. As detailed in the State-certified EIR, the 2017 Project’s effect cumulative noise remained significant and unavoidable even with the consideration of all feasible mitigation measures and alternatives. As described in

¹¹ USEPA. Nonroad Compression-Ignition Engines: Exhaust Emission Standards. 2016. Available at: <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P100OA05.pdf>.

the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:

- 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 State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091, subd. (a)(3); Pub. Resources Code, § 21081, subd. (a)(3); 14 Cal. Code Regs. § 15163(e).)

E. Solid Waste

- 2017 Project. At the time of publication of the State-certified EIR, Los Angeles County had not identified an adequate supply of landfill space beyond 2020. The State-certified EIR evaluated various alternatives and mitigation options to reduce the potential effects on the environment. The State-certified EIR determined that no feasible mitigation measures or alternatives would reduce the impact to less than significant levels. Accordingly, the 2017 Project-generated increase in solid waste was considered a significant and unavoidable impact. CDFW determined that the significant solid waste effects are acceptable because of specific overriding economic, legal, social, and technological considerations, as well as Project benefits. (See Section 4.20 of the State-certified EIR and CDFW Findings for additional information.)
- Modified Project. The SEIR evaluated the Modified Project's potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. As described in the Project Description, Section 3.0 of the Draft SEIR, the Modified Project would not increase the general scope and intensity of development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area and permanent disturbance area. The Modified Project does not generate an increase in solid waste compared to the 2017 Project. As described in the SEIR, since the time of the State-certified EIR, additional solid waste disposal opportunities have been identified by the County that the Modified Project could utilize. As a result and for the reasons described in the Draft SEIR, the SEIR determined that the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts related to solid waste compared to the 2017 Project as analyzed in the State-certified EIR. Thus, no new mitigations measures are required. (See Section 5.01 of the SEIR for additional information.)
- Finding. As detailed in the State-certified EIR, the 2017 Project's effect solid waste remained significant and unavoidable even with the consideration of all feasible mitigation measures and alternatives. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:

- 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 State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091, subd. (a)(3); Pub. Resources Code, § 21081, subd. (a)(3); 14 Cal. Code Regs. § 15163(e).)
- Comments and Summary of Responses to Comments. A commenter claimed that the closing of the Chiquita Canyon Landfill must be disclosed in the Final SEIR. As discussed in Responses to Comments No. 9-25 and 9-26, the Chiquita Canyon Landfill stopped accepting solid waste on January 1, 2025, after the Draft SEIR was circulated. Section 5.13, Utilities and Service Systems—Solid Waste was updated in the Final SEIR to reflect this change in baseline conditions and the analysis therein now considers disposal at the two open landfills serving the Santa Clarita area. These revisions do not affect the amount of solid waste generated by the Modified Project, and the Modified Project would result in a reduction in solid waste disposal compared to the 2017 Project. Therefore, the Modified Project would not result in a new significant impact or substantially more severe significant impacts related to operation-related solid waste disposal as compared to those identified in the State-certified EIR for the 2017 Project. Thus, the comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve “significant new information” triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

F. Wildfire

- 2017 Project. The State-certified EIR concluded that the 2017 Project would result in significant cumulative impacts related to wildland interface fires. The State-certified EIR evaluated various alternatives and mitigation options to reduce the potential effects on the environment. The applicable mitigation measures are RMDP/SCP-PH-7 and RMPD/SCP-PH-14. Even with implementation of all feasible mitigation measures and alternatives as described in the State-certified EIR, CDFW concluded that the 2017 Project’s contribution to wildland fire impacts was significant and unavoidable. CDFW found that although changes and alterations were incorporated into project design, and mitigation measures have been adopted to substantially avoid or mitigate significant environmental effects, effects would remain significant and unavoidable. CDFW determined that the significant wildfire effects are acceptable because of specific overriding economic, legal, social, and technological considerations, as well as Project benefits. (See Section 6 of the State-certified EIR and CDFW Findings for additional information.)

- Modified Project. The SEIR evaluated the Modified Project’s potential impacts compared to the 2017 Project based on project changes, new information, or changed circumstances. As described in the Project Description, Section 3.0 of the Draft SEIR, the Modified Project would not increase the general scope and intensity of development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area and permanent disturbance area. The changes associated with the Modified Project would not increase wildfire risks relative to the 2017 Project. With enhancements in regulatory requirements over time, the Modified Project and cumulative development in the area would be obligated to incorporate enhanced building design measures and fuel modification measures to reduce the risk of structure ignition, wildfire spread, and wildfire exposure as a matter of regulatory compliance that were not feasible at the time of the State-certified EIR considered cumulative wildfire impacts. The Modified Project does not increase vehicle trips or bringing residents to the project site compared to the 2017 Project, and therefore does not increase the cumulative contribution of those impacts compared to the 2017 Project. Further, mitigation measures previously adopted for the 2017 Project would continue to be implemented under the Modified Project. As a result and for the reasons described in the Draft SEIR, the SEIR determined that the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts related to wildfire compared to the 2017 Project as analyzed in the State-certified EIR. Thus, no new mitigations measures are required. (See Section 5.14 of the SEIR for additional information.)
- Finding. As detailed in the State-certified EIR, the 2017 Project’s cumulative wildfire effects remained significant and unavoidable even with the application of all feasible mitigation measures and alternatives. As described in the SEIR, the Modified Project does not result in a new or substantially more severe significant effect. Accordingly:

 - Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final State-certified EIR and SEIR. (14 Cal. Code Regs. § 15091(a)(1); Pub. Resources Code, § 21081(a)(1); 14 Cal. Code Regs. § 15163(e).)
 - 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 State-certified EIR as supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(3); Pub. Resources Code, § 21081(a)(3); 14 Cal. Code Regs. § 15163(e).)
 - Comments and Summary of Responses to Comments. As described above, a commenter made general assertions about the Draft SEIR’s analysis of wildfire impacts but did not identify specific deficiencies with the Draft SEIR. As detailed in Response to Comment No. 12, the Draft SEIR

describes that the State-certified identified a significant and unavoidable impact to cumulative wildfire risk because, at that time, cumulative new projects in the area were not subject to the same type of wildfire mitigation included in the State-certified EIR. However, the Draft SEIR explains that since the time of the State-certified EIR, regulatory requirements for new development have grown much more stringent under the California Fire Code, County Fire Code, and California Building Code. These updated standards now meet or exceed the wildfire mitigation measures contemplated by the State-certified EIR. The modern fire codes include fire prevention and protection measures that reduce the risk of structure ignition and spreading, as well as minimum brush management and fuel modification zones, subject to County Fire oversight. New roads and infrastructure must be built to modern code standards, providing adequate access and ingress/egress.

Further, the Draft SEIR discusses that the Santa Clarita Valley Area Plan EIR analyzed regional wildfire risks for buildout of the area after the State-certified EIR's analysis of wildfire impacts. The Area Plan EIR concluded that new cumulative development of the area would result in less than significant cumulative impacts with the implementation of applicable regulatory requirements. Thus, cumulative growth in the area would result in less than significant wildfire impacts.

The Draft SEIR describes that the Modified Project would not increase the number of residents relative to the 2017 Project and therefore would not increase cumulative growth risks compared to the 2017 Project. For these reasons, the Draft SEIR concludes that the Modified Project does not result in a new or substantially more severe significant cumulative impact compared to the 2017 Project. Accordingly, contrary to the commenter's non-specific assertion, the Draft SEIR properly analyzes and discloses cumulative wildfire risk for the Modified Project.

Thus, the comments and responses to comments, including any revisions to the Draft SEIR made in the Final SEIR do not involve "significant new information" triggering recirculation pursuant to CEQA Guidelines Section 15088.5 because the information does not involve a new or substantially more severe significant impact and instead merely clarifies, amplifies, or makes insignificant modifications to the SEIR. The Final SEIR, Responses to Comments, addresses and responds to comments on this topic in satisfaction of CEQA.

VII. ALTERNATIVES

The Draft and Final SEIR incorporates by reference and relies on the range of alternatives and associated analysis provided in the State-certified EIR, Chapter 5. The State-certified EIR considered a number of on-site and off-site alternatives to the originally proposed project, including a no project alternative and six "build" alternatives. As discussed above, the County

has previously assumed the buildout of Entrada South and Valencia Commerce Center in plans, such as the Santa Clarita Valley Area Plan, for which CEQA documentation was prepared that included a range of alternatives as required by CEQA. Because the SEIR did not identify any new or substantially more severe significant impacts compared to the 2017 Project evaluated in the State-certified EIR, and the purpose of the alternatives analysis in a Supplemental EIR is to evaluate a range of alternatives that would avoid or minimize new or substantially more severe significant impacts, in accordance with CEQA Guidelines Section 15126.6(e), the No Modified Project Alternative is analyzed in the Draft SEIR and discussed below:

A. No Modified Project Alternative

Under CEQA Guidelines Section 15126.6(e)(3)(B), the no project alternative may discuss “predictable actions by others, such as the proposal of some other project” if disapproval of the project under consideration were to occur. CEQA Guidelines Section 15126.6(e)(3)(C) further states that the no project alternative should reflect “what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” Based on this guidance, the No Modified Project Alternative assumes the Modified Project Site would be developed with uses consistent with the 2017 Project. As noted above, the 2017 Project has slightly more residential uses and fewer non-residential uses compared to the Modified Project.

The Modified Project includes enhanced environmental protections related to the protection and restoration of portions of the Unnamed Canyon 2 drainage channel and increased environmental protections to wetlands and related biological resources by reducing permanent impacts to Hasley Creek and Castaic Creek. Therefore, the No Modified Project Alternative would result in greater permanent direct impacts to habitat than the Modified Project and would also result in a slight increase in the amount and extent of impermeable or impervious features within the Modified Project Site as compared with the Modified Project. As such, the No Modified Project Alternative would result in greater impacts with respect to biological resources and hydrology than the Modified Project.

Although the No Modified Project achieves some of the Project Objectives, the No Modified Project Alternative would not meet the Modified Project objective to reduce permanent impacts to on-site drainage channels compared to the 2017 Project as analyzed in the State-certified EIR.

B. Finding

The County finds that the No Modified Project would result in greater impacts when compared to the Modified Project and does not meet the Modified Project objective to reduce permanent impacts to on-site drainage channels compared to the 2017 Project as analyzed in the State-certified EIR. Accordingly:

- 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 State-certified EIR as

supplemented by the SEIR. (14 Cal. Code Regs. § 15091(a)(3); Pub. Resources Code, § 21081(a)(3); 14 Cal. Code Regs. § 15163(e).)

VIII. GROWTH INDUCING IMPACTS

CEQA requires a discussion of ways in which the Modified Project could be growth inducing. The CEQA Guidelines identify a project as growth inducing if it fosters economic or population growth or if it encourages the construction of additional housing either directly or indirectly in the surrounding environment (CEQA Guidelines, Section 15126.2(e)). New population from residential development represent direct forms of growth. This direct form of growth has a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

In accordance with Section 15126.2(e) of the CEQA Guidelines, the growth-inducing analysis of the proposed project must address two key issues. The first is the potential for the project to foster economic or population growth or the construction of additional housing (either directly or indirectly) in the surrounding environment. The second issue is the potential for the project to encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Typically, this issue involves the project's potential to induce further growth by the expansion or extension of existing services, utilities, or infrastructure. By definition, the CEQA Guidelines state that "it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment."

Growth inducing impacts associated with the Modified Project would be consistent with those identified in the State-certified EIR for the 2017 Project. The proposed development of the Modified Project would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. Like the 2017 Project, the Modified Project would not induce substantial unplanned population growth in the Entrada South or VCC Planning Areas. As discussed, the Entrada South Planning Area is designated in the Area Plan as H5—Residential 5 south of Magic Mountain Parkway and CM—Major Commercial north of Magic Mountain Parkway, with a small portion designated OS-PR—Parks and Recreation south of the Southern California Edison electric transmission lines. The VCC Planning Area is designated in the Area Plan as IO—Industrial Office, which allows for development of the proposed uses. As the Modified Project's uses are consistent with these designations, such development as well as the associated population have been anticipated and planned for in the Area Plan. Furthermore, the Modified Project represents buildout of a portion of the previously approved and partially constructed Valencia Commerce Center, which was the subject of a 1991 EIR certified by the County.

As for infrastructure-induced population growth, the Modified Project would not extend or expand services, utilities, or infrastructure compared to the 2017 Project. Like the 2017 Project, the Modified Project's roadway improvements are intended to improve access to the Modified Project Site, reduce vehicle idling and queuing, improve access to public transit, and minimize unnecessary travel throughout the Modified Project Site. Utility and other infrastructure upgrades are also consistent with those proposed in the 2017 Project and are intended to meet Modified Project-related demand.

As the Modified Project would be consistent with the general scope and intensity of development associated with the 2017 Project, the Modified Project would not result in new significant growth-inducing impacts.

Growth inducement is also evaluated in relation to whether population growth is planned or unplanned. As described above, buildout of Entrada South and Valencia Commerce Center has been included in the County's plans approved over time, including but not limited to the Santa Clarita Valley Area Plan, Housing Element Update to General Plan, and General Plan update. In addition, buildout of Entrada South and Valencia Commerce Center has been included in all three regional plans approved by SCAG to integrate land use and transportation plans to achieve state greenhouse gas reduction climate targets.

IX. STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered "acceptable" (State CEQA Guidelines Section 15093(a)). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Such reasons must be based on substantial evidence in the Final SEIR or elsewhere in the administrative record (State CEQA Guidelines Section 15093(b)). The agency's statement is referred to as a "Statement of Overriding Considerations." The following sections provide a description of the significant and unavoidable adverse impacts and the justification for adopting a statement of overriding considerations.

A. Significant and Unavoidable Adverse Impacts

As summarized in the Executive Summary (Section 2) of the SEIR, the State-certified EIR identified the following significant and unavoidable impacts for the 2017 Project even after the imposition of all feasible mitigation measures. The SEIR determined that the Modified Project does not result in a new or substantially more severe significant effects related to these impact areas.

- **Air Quality (Threshold 5.1-2):** The State certified EIR determined that the 2017 Project would exceed South Coast AQMD's significance thresholds during construction for VOC, NO_x, PM₁₀, and PM_{2.5}. The State-certified EIR evaluated various alternatives and mitigation measures to reduce the potential effects on the environment. Even with the implementation of all feasible mitigation and alternatives, the State-certified EIR concluded that these impacts remained significant and unavoidable. The SEIR determined that the Modified Project does not result in a new or substantially more severe significant effects related to Air Quality.
- **Air Quality (Threshold 5.1-3):** The State certified EIR determined that the 2017 Project would exceed South Coast AQMD's localized significance thresholds (LSTs) during construction and operation. The State-certified EIR evaluated various alternatives and mitigation measures to reduce the potential effects on the

environment. Even with the implementation of all feasible mitigation and alternatives, the State-certified EIR concluded that these impacts remained significant and unavoidable. The SEIR determined that the Modified Project does not increase air emissions compared to the 2017 Project and does not result in a new or substantially more severe significant effects related to Air Quality.

- **Noise (Threshold 5.8-1):** The State certified EIR determined that the 2017 Project would have Significant and Unavoidable cumulative operational traffic noise impacts along 11 roadway segments based on the full development analyzed in the State-certified EIR (not limited to the Entrada South and VCC Planning Areas). The State-certified EIR evaluated various alternatives and mitigation measures to reduce the potential effects on the environment. Even with the implementation of all feasible mitigation and alternatives, the State-certified EIR concluded that these impacts remained significant and unavoidable. The SEIR determined that the Modified Project does not increase vehicle trips compared to the 2017 Project and does not result in new or substantially more severe significant effects related to Noise, including with respect to this offsite roadway noise impact.
- **Solid Waste (Threshold 5.13-1):** The State-certified EIR concluded that the 2017 Project would result in a significant and unavoidable impact related to solid waste disposal due to the potential for limited landfill disposal capacity. The State-certified EIR evaluated various alternatives and mitigation measures to reduce the potential effects on the environment. Even with the implementation of all feasible mitigation and alternatives, the State-certified EIR concluded that these impacts remained significant and unavoidable. The SEIR determined that the Modified Project would reduce construction-related solid waste disposal compared to the 2017 Project, in part due to more stringent diversion requirements now in effect. As discussed above, the County has identified additional landfill capacity. Therefore, the SEIR determined that the Modified Project would not result in any new or substantially more severe impacts related to construction-related Solid Waste.
- **Wildfire (Threshold 5.14-2):** The State-certified EIR concluded that the 2017 Project would result in a significant and unavoidable impact related to wildland interface fires were cumulatively significant and unavoidable (not limited to the Entrada South and VCC Planning Areas). The State-certified EIR evaluated various alternatives and mitigation measures to reduce the potential effects on the environment. Even with the implementation of all feasible mitigation and alternatives, the State-certified EIR concluded that these impacts remained significant and unavoidable. The SEIR determined that the Modified Project does not result in new or substantially more severe significant effects related to cumulative Wildfire impacts because the Modified Project and other cumulative projects located within the area would be consistent with the overall development, infrastructure, and circulation framework established by the Area Plan and would be required to comply with the California Fire Code, County Fire Code Title 32, and County Fire requirements, which are more stringent than the

standards considered in the State-certified EIR. The Modified Project also would not increase the number of residents relative to the 2017 Project as analyzed in the State-certified EIR. In addition, PDF-WF-1 through PDF-WF-6 would provide additional environmental and wildfire safety benefits for the Modified Project, further reducing the Modified Project's potential impact related to wildfire relative to the 2017 Project as analyzed in the State-certified EIR.

B. Project Benefits in Support of the Statement of Overriding Considerations

Pursuant to Public Resources Code Section 21081(b) and Guidelines Section 15093, the County has balanced the benefits of the Modified Project against the significant and avoidable impacts identified in the State-certified EIR as supplemented by the SEIR. As described above, the State-certified EIR identified the following significant and unavoidable impacts for the 2017 Project even after the imposition of all feasible mitigation measures. The SEIR determined that the Modified Project does not result in new or substantially more severe significant effects.

CEQA Guidelines Section 15126.2(c) requires an explanation of why a project is being proposed, notwithstanding significant and unavoidable impacts.

The County hereby incorporates by reference the Statement of Overriding Considerations adopted by the CDFW as part of the 2017 CEQA Findings, as supplemented by these findings. The 2017 Statement of Overriding Considerations describes benefits of the 2017 Project and benefits resulting from buildout. All such benefits remain fully applicable and justify the Statement of Overriding Considerations. These benefits include, without limitation, the following described in the CDFW Findings, which apply to the Modified Project:

Previously Identified Benefits of the Net-Zero GHG Plan

The 2017 Project represents an innovative demonstration of a mixed-use development project providing needed housing and commercial development in a manner consistent with California's GHG reduction goals. Once developed, the 2017 Project will be one of the largest, if not the largest, developments ever in California to achieve net zero GHG emissions. Benefits achieved from the project are exemplified by, but are not necessarily limited to, the following:

- With implementation of Mitigation Measures 2-1 through 2-13, the Project will reduce all Project-related construction and operational GHG emissions to net zero over the 30-year project life.
- As highlighted in ARB's draft *2017 Climate Change Scoping Plan Update*, the 2017 Project serves as one of "[s]everal recent examples of sustainable land use development projects in California [that] have demonstrated Iha! it is feasible to design projects that achieve zero net additional GHG emissions."
- The 2017 Project will design and construct residential development, commercial development, private recreation centers, and public facilities to achieve Zero Net Energy standards, as defined by the California Energy

Commission, which advances California policy goals of increasing the energy efficiency of homes and commercial buildings.

- The 2017 Project will install an electric vehicle charging station at every residence, as well as thousands more electric vehicle charging stations in commercial areas within the project site and off-site throughout Los Angeles County. The 2017 Project will also provide subsidies for the purchase of zero emission vehicles to Project residents. This suite of mitigation commitments is expected to make the 2017 Project a model community for electric vehicle ownership and increase the electric vehicle adoption rate within the Santa Clarita area and Los Angeles County, advancing state, regional and local goals to reduce emissions through an increased use of electric vehicles.
- The 2017 Project will implement a comprehensive Transportation Demand Management Plan, including subsidies for transit, neighborhood electric vehicles, and e-bikes, to reduce vehicle miles traveled and enhance the use of alternative transportation modes both on and off the 2017 Project site, advancing state, regional and local policy goals.
- The 2017 Project will provide funding for the purchase, operation and maintenance of a zero emission school bus program, and offer subsidies to transit providers for the replacement of up to 10 diesel or compressed natural gas transit buses with zero emission buses.
- The 2017 Project will undertake or fund a building retrofit program to improve the energy efficiency of homes and other buildings within disadvantaged communities in Los Angeles County.
- The 2017 Project will achieve GHG reductions by implementing direct reduction activities in accordance with the project's GHG Reduction Plan.

Previously Identified Economic Benefits

Based on a report prepared by the Los Angeles County Economic Development Corporation, Institute of Applied Economics, construction of the 2017 Project will generate thousands of construction and permanent jobs along with billions of dollars in business revenue and tax proceeds, which will benefit the Santa Clarita area and Los Angeles County.

Additional Benefits

In addition to these previously identified benefits, the County finds that the Modified Project provides multiple benefits supporting this Statement of Overriding Considerations. The Modified Project would implement the development and resource management activities facilitated by the 2017 Project in the Entrada South and VCC Planning Areas while preserving and enhancing on-site natural resources. The Modified Project would result in a mixed-use community that provides housing, commercial and industrial/business park uses, recreational areas, public facilities, and economic opportunities, consistent with the State-

certified EIR, the Santa Clarita Valley Area Plan: One Valley One Vision, the County Housing Element and the County's General Plan Update. The statement of overriding considerations for the certified EIRs prepared for these approved County plans is hereby incorporated by reference.

Consistent with the 2017 Project, the Modified Project would help accommodate regional growth projected by the Southern California Association of Governments (SCAG) in the Santa Clarita Valley Planning Area within adjacent to existing, approved, or planned infrastructure, urban services, transportation corridors, transit facilities, and major employment centers. It would avoid leapfrog development, unnecessary infrastructure extension, and "patchwork" development that uses undue open space and natural resources by locating and concentrating development within and adjacent to existing, approved, and planned urbanized areas and regional transportation and transit facilities. The Modified Project would provide a range of residential housing types, sizes, and styles near existing and proposed transit centers to serve the needs of a growing and increasingly diverse population within the County and the Santa Clarita Valley. Additionally, the Modified Project would provide for commercial development that serves the needs of the local population and generates employment opportunities. The Modified Project is also consistent with the three Connect SoCal plans approved by SCAG to integrate land use and transportation planning to achieve state greenhouse gas reduction targets, and as a net zero greenhouse gas project also accommodates population and employment growth with no net greenhouse gas emissions. The statement of overriding considerations for the certified EIRs prepared for Connect SoCal (2016, 2020 and 2024) are hereby incorporated by reference.

The Modified Project would provide a new master planned development with a balance of jobs and housing interconnected with the surrounding existing and planned communities and offers enhanced public improvements to promote walkability, connectivity, and safety. It would also continue building out the previously approved Valencia Commerce Center industrial/business park center, thereby focusing such uses in an infill area and improving connectivity between existing industrial/business park uses.

For these reasons, the Modified Project is being proposed notwithstanding the significant and unavoidable environmental impacts described herein.

C. Conclusion

In balancing the benefits described above with the significant and unavoidable environmental impacts described in the State-certified EIR as supplemented by the SEIR, the County finds that each of the Modified Project's benefits, individually and collectively, outweigh the significant and unavoidable environmental impacts, such that these impacts are acceptable. The County further finds that substantial evidence presented in the Final SEIR supports adopting the Final SEIR despite the potential adverse environmental impacts.

For the reasons described in these Findings and pursuant to Section 15090 of the CEQA Guidelines the County of Los Angeles finds that the SEIR for the Modified Project (1) complies with CEQA and all other applicable laws, (2) was presented to the decisionmaking body of the lead agency and that the decisionmaking body reviewed and considered the information contained in the Final SEIR prior to approving the project; and (3) the reflects the lead agency's

independent judgment and analysis. The County therefore certifies the SEIR for the Modified Project.