

## ENTRADA SOUTH/VALENCIA COMMERCE CENTER ADDITIONAL INFORMATION

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**To:** Eyestone Environmental  
**From:** Dudek Fire Protection Planning Team  
**Subject:** Additional Information Related to Response to Comments  
**Date:** November 2025  
**Attachment(s):**

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This tech memo has been prepared to provide additional information related to responses to comment letters submitted to the Los Angeles County Regional Planning Commission prior to the hearing on October 1, 2025. The information in this memo clarifies and adds to the prior responses to comments but does not change the overall analysis or conclusions. The comments raised issues regarding the following topics:

- Allegations that Section 5.14 of the Final SEIR and the supporting Fire Protection Plan (FPP) fail to analyze the open space directly west-southwest of the Entrada South planning area and, allegedly, instead relies upon an inaccurate conclusory determination that the planning area is surrounded by development to support dismissal of consideration of nearby open space.
- Assertions that the Fire Protection Plan did not account for the Spineflower Preserve and that the Spineflower Preserve creates a wildfire hazard that was not analyzed.
- Claims that the Wildfire Evacuation Plan (WEP) did not address the proximity to undeveloped land and the risk, impacts, and dangers it poses.

As described herein, these comments do not raise any new material issues and incorrectly characterizes the FPP and Final SEIR. The FPP includes a conservative analysis that accounts for the surrounding adjacent land uses and the regional open space, even modeling wildfire behavior in the precise area that the commenter identifies; the open space to the west-southwest. Further, the Spineflower Preserve was specifically addressed through the Spineflower Preserve Fire Management Plan described in section 3.3.4 of the FPP. Finally, measures described in the FPP as a system of fire protection measures are implemented through regulatory compliance which successfully address the hazard and reduce risk to an acceptable level, as determined by relevant codes and regulations and backed by fire science and with additional benefits of wildfire Project Design Features at the Project site. The comments do not require any changes to the FPP or the related analysis in the SEIR.

### Comment Topic No. 1 -FPP Evaluation of Open Space

Contrary to this comment, the FPP accurately and appropriately considers surrounding development as a necessary part of wholistic analysis of wildfire risk, including open space and undeveloped areas. The FPP sets the regional context of the Project in Section 1.2.1, which includes a discussion of the open space and natural areas:

The Project's region is located in a broad ecological and biogeographic transition zone for the coastal and mountain ecoregions. This alluvial Santa Clara River Valley also provides access via the Santa Clara River to the edges of the Mojave Desert and the foothills of the San Gabriel Mountains. While much of the region has been subject to rapid urbanization and historical agricultural and oil development practices, large areas of open space and natural lands border the region. The Los Padres National Forest is located to the north of the Project Site and the Angeles National Forest lies to the north and east. The Santa Susana Mountains, a region of gently rolling hills and sharp, steep-walled canyons, is south of the Modified Project Site.

The FPP, Section 2.2, describes the fire risk from nearby open space and natural areas that could impact the Modified Project:

Following proposed development activity in the area, would break up large expanses of non-maintained fuels, however, the proximity of the Modified Project Site to large expanses of open space to the south in the Santa Susana Mountains and potential ignition sources along I-5, SR-126, and surface streets in the Stevenson Ranch, Valencia, and Santa Clarita there remains an increased wildfire hazard in the area. Additionally, the terrain within the Santa Clara River Valley, including multiple sub-drainages and canyons, has the potential to funnel Santa Ana winds, thereby increasing local wind speeds and increasing wildfire hazards in the region.

On page 89 of the FPP within Section 5.2.1.1, which is a project specific assessment of offsite wildfire risk potential, the FPP recognizes that the planned development areas are located near both open spaces and development areas. Examples are provided for Entrada South including Magic Mountain Parkway to the north, The Old Road and Interstate-5 to the east, the Westridge Community to the south, and the Mission Village Project to the west which is currently being developed. On page 90, within the same section, further acknowledgement is given to surrounding areas of development "including community areas, industrial parks, and major roadways" which again, significantly alter the progression of fire. On page 120, within Section 8.1.1.1 which addresses wildfire related construction impacts, acknowledgement is again provided that the Project "is generally surrounded by development and not entirely adjacent to undeveloped, high fuel areas".

Surrounding land uses are an important consideration of wildfire planning due to the interruption of available fuels by conversion of wildland to structures, paved areas, and maintained landscaping thereby disrupting availability of wildfire pathways. The surrounding roadways and adjacent land uses are depicted in Figure 3.0-4 of the EIR Project Description. The FPP appropriately considered these immediately adjacent land uses, acknowledging that they create fuel breaks which impact regional fire progression. Nonetheless, the FPP also addresses open space land uses not immediately adjacent to Entrada South in Section 1.2.1 – Location and analyzes fire behavior on adjacent land uses through fire behavior modeling in Section 4 – Modeling: Anticipated Fire Behavior. As noted above, in Section 1.2.1, the FPP acknowledges the rapid urbanization of the area, but points out that open space and natural land border the region. In Section 4, fire behavior is modeled on the southeast facing slope to the southeast of the Entrada South project site between the Project and The Old Road, the south-facing slope south of the Entrada South project site between the Project and The Oaks Golf Course, and north facing slope west-southwest of the Entrada South project site in the open space across Westridge Parkway. The vegetation types analyzed are identified in Figure 6A of the FPP, and the fire behavior scenarios are demonstrated geographically in Figure 7A. Both of these figures demonstrate the open space to the west-southwest along with the ongoing grading and development of the Mission Village planning area.

Fire behavior modeling to the west-southwest considered on-shore fire behavior, given that a wind from the southwest would direct fire towards the Project site. The modeling results indicated that fire moving through the vegetation in the wildland west of Westridge Parkway would produce 15-foot flame lengths with an intensity of 2,059 BTU/feet/second and ember spotting up to 0.5 miles ahead of the flaming front.

As discussed throughout the FPP, the project is required to comply with the requirement to provide Fuel Modification Zones (FMZs), a reliable means of slowing wildfire by removing available fuels from the path of the fire. These FMZs would be provided between the southwestern structures and the open space, to include 100 feet of FMZ compliant landscaping on the Project site and 100 feet of paved Westridge Parkway with adjacent pedestrian/bike trails. Further, there is 100 feet of roadside vegetation maintenance along the west side of Westridge parkway. This provides 300 feet of separation between the Project structures and the open space, which is 20 times wider than the 15-foot flame lengths expected in the area. This FMZ will protect the structures from ignition related to direct-flame impingement, radiant heating, or convective heating, but the modeling supports that embers may travel 0.5 miles ahead of the fire front. Should embers fall onto the Project area, they would fail to find available fuel as a result of the FMZs, specifically Zone 0 which requires the complete omission of combustibles within 5 feet of the structures and Zone 1 which is an irrigated limited planting area within 30 feet of homes.

Structures are also required to comply with the ignition resistant construction requirements of Chapter 7A of the California Building Code (CBC), hardening the structures and preventing means of ignition from embers through non-combustible exterior finishes and protected vents. Exhibit 1 was prepared for the Los Angeles County Regional Planning Commission Meeting on October 1, 2025, and demonstrates these features.

**Exhibit 1 – Ignition resistant Construction Requirements per Chapter 7A of CBC**



The commenter states that fire in the open space to the west-southwest would have a “direct pathway to the Entrada South planning area,” but this comment is not accurate because land uses around the Modified Project site and the required FMZs will interrupt that potential fire pathway. The adjacent Mission Village development and Westridge Parkway are important considerations of the wildfire analysis; their role in buffering the Entrada South project from a potential wildfire is a realistic consideration that would disrupt fire progression due to the elimination of vegetative fuels.

Further, the FPP does thoroughly address wildfire in the open spaces beyond immediate improvements surrounding the Project site, even modeling fire in those areas. While fire would not be able to progress directly to the project site given the elimination of fuels through FMZs and surrounding roadways and development that act as fire breaks, modeling did identify that ember spotting could occur and impact the project. However, through compliance with FMZ requirements throughout the Project site and Chapter 7A, the Project is protected from ignition by embers and the analysis determined that impacts to the Modified Project would be less than significant. As extensively detailed in the FPP, Final SEIR and responses to comments, the modern master-planned communities, such as the Modified Project, have proven to be highly resistant to wildfires.

### **Valencia Commerce Center**

Similar to Entrada South, wildfire analysis considers both open space and adjacent land uses in the wholistic wildfire analysis of VCC, including the regional context provided above. As stated in 5.2.1.1 of the FPP, “the VCC planning area is similarly surrounded by areas of development including industrial areas, the Hasley Canyon Community, Highway 126, and Interstate-5”. These immediately adjacent areas of development function as fuel breaks and limit potential for wildfire progression from the regional wildland. This is depicted in Figure 3.0-5 of the EIR Project Description and again in Figure 6B and 7B within the FPP. Required FMZs are achieved through onsite landscaping or offsite equivalencies and buffer the project structures from open space adjacent to or within the Project area which will prevent the opportunity for direct flame impingement, convective heat contact, or radiant heat contact with the structures. The VCC planning area is also required to comply with Chapter 7A requirements and onsite FMZs which eliminate susceptible fuel beds for embers. As extensively detailed in the FPP, Final SEIR and responses to comments, the modern master-planned communities, such as the Modified Project, have proven to be highly resistant to wildfires.

## **Comment Topic No. 2 – FPP Considered Spineflower Preserve**

The FPP addresses the Spineflower Preserve in various locations, including it as a component of the Project in Section 1.2.3.2 Modified Project Description and further analyzing the preserve area in 3.3.4 – Spineflower Preserve Fire Management Plan. As discussed in the FPP, the Fire Management Plan for the Spineflower Preserve was developed to avoid and minimize direct and indirect impacts on the San Fernando Valley Spineflower. As stated in the FPP, annual thinning is required in the portion of the Spineflower Preserve that overlaps the Fuel Modification Zones (FMZs). Fuel modification activities are allowed in the Preserve as necessary to satisfy the fuel modification requirements but are limited to selective thinning with hand tools to allow maximum preservation of the Spineflower populations. This method of selective thinning by hand eliminates fuels in accordance with requirements for FMZs while protecting the Spineflower population.

The commenter implies that the inclusion of the Spineflower Preserve in the Project increases proximity to wildland which could support the uncontrolled spread of wildfire into the Project. In reality, the Project provides fully compliant FMZs on the project area between project structures and the Spineflower Preserve, then continues the fuel management into the preserve area through implementation of the Spineflower Preserve Fire Management

Plan. FMZs are highly effective at protecting project structures from wildfire by eliminating fuels from a wildfire's pathway; the effectiveness of FMZs has been thoroughly discussed in Section 3.2 of the FPP. As discussed above and extensively detailed in the FPP, Final SEIR and responses to comments, the modern master-planned communities, such as the Modified Project, have proven to be highly resistant to wildfires.

### Comment 3 -Wildland Fire Evacuation Plan Address Fire Risks of Undeveloped Areas

Comments incorrectly assert that the Wildfire Evacuation Plan (WEP) did not account for surrounding development, which is not the case and the WEP accurately analyzed and disclosed potential impacts. On page 4 of the Wildfire Evacuation Plan (WEP) within Section 1.5 - California Office of Attorney General's Guidance, the statement is made that "the Project is a higher density, clustered development that does not have an extended, intermix "edge" with a wildland interface area". This statement is made in response to the previously stated excerpt from the AG guidance that projects should be analyzed relative to the particular risk. In the case of the Project, that risk was substantiated in the FPP.

As discussed throughout the FPP and herein in response to comment 1, the FPP evaluated how wildfire would move through the area and how regulatory compliance would adequately protect the structures with the additional benefit of Project Design Features. There are two methods by which wildfire may impact a project. Wildfire could impact a project by directly igniting structures through direct flame impingement, convective heat transfer, or radiant heat transfer. Wildfire could also impact a project through showering embers upon the Modified Project which can create an ignition when the ember comes in contact with untreated landscape or structures. Through regulatory compliance with FMZ requirements and Chapter 7A Ignition Resistant Construction Requirements, the Modified Project is protected both from direct contact with wildfire and contact with embers. The surrounding improvements identified in the FPP such as the surrounding roadways and developed areas, have a tangible effect on wildfire movement, because they replace fuels with paved areas, treated landscapes, and structures.

The WEP's analysis that "the Project is a higher density, clustered development that does not have an extended, intermix "edge" with a wildland interface area" is in response to the findings from the FPP. This statement differentiates the Modified Project from developments with structures intermixed within wildland,<sup>1</sup> which is not the case for the Project because it has defined clustered areas that are separated from open space, not intermixed. Each clustered development area for the Modified Project includes paved areas, Chapter 7A compliant structures, and landscape compliant with FMZ regulations and is separated from open space by compliant FMZs. This is in stark contrast to an intermix community where untreated fuels weave around structures and create fire pathways through a community.

A comment specifically quotes a portion of a sentence from page 115 of the FPP: "the Modified Project is surrounded by existi[ng] development and infrastructure and located in a relatively high-density area". The commenter does not include that the sentence continues on to state "...it is more likely that if evacuation were to occur it would occur in a staged manner". The full sentence as written identifies that the Modified Project is located around existing development, including the City of Santa Clarita, with major roadway arterials, including I-5, Highway 126, The Old Road, and other major roadways, and that evacuation would be carried out in a staged (phased) manner, when possible, utilizing the various roadways available to Project occupants to evacuate those most at risk prior to those less proximate to the fire. The WEP correctly analyzes the evacuation risk for the Modified Project's

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<sup>1</sup> <https://www.nist.gov/el/fire-research-division-73300/wildland-urban-interface-fire-73305/hazard-mitigation-methodology-9>

regional location in contrast to low-density intermix areas that do not have multiple roadways available for evacuation and do not have the ability to phase evacuation. Section 4.1 of the WEP analyzes how phased evacuations could occur based on the regional roadway network that exists and will be available to the Project. In addition, the WEP completed a conservative modeling analysis that analyzed a worst-case mass evacuation, providing that analysis as a worst-case baseline and noting that the County's ability to phase evacuations would improve upon this worst-case model.

Specifically, Appendix C of the WEP is the evacuation modeling and analysis, which modeled a mass evacuation of the existing conditions, the 2017 approved project, and the modified project. The modeling accounted for 4,763 residents in the communities surrounding VCC including North Bluffs, Halsey Hills, Halsey Canyon, Live Oak, and others. In an effort to remain conservative, the modeling did not take into account the proposed secondary emergency access (see Figure 5.9-6 from the Transportation section of the EIR) road that will connect the existing Live Oak Road with the VCC planning area, providing an alternate route to residents of Live Oak Canyon. The modeling concluded that the evacuation times remained unchanged or slightly improved when comparing the modified project against the 2017 approved project, therefore, the Modified Project would not result in a new significant impact related to evacuation.

EYESTONE ENVIRONMENTAL  
2121 Rosecrans Avenue, Suite 3355  
El Segundo, California 90245

**REVIEW OF CLARK & ASSOCIATES COMMENTS FOR ENTRADA SOUTH AND VALENCIACOMMERCE CENTER (VCC)- ADDITIONAL INFORMATION RELATED TO RESPONSE TO FREEWAY DISTANCE, BACK-UP GENERATORS, AND VALLEY FEVER IMPACTS**

Dear Eyestone Environmental:

Date: November 2025

Ramboll Americas Engineering Solutions, Inc. (Ramboll) has prepared this analysis regarding the air quality comments submitted in regards to the Entrada South and Valencia Commerce Center Project (“Project”; *Entrada South and Valencia Commerce Center Project Final Supplemental Environmental Impact Report (Project Nos. 00-210-(5), 87-150-(5); DA No. RPPL2025003357; VTTM No. 53295; Zone Change No. 00-210; CUP No. 00-210)*). This letter provides additional information related to the responses to the Adams Broadwell Joseph & Cardozo comment letter dated September 30, 2025 (“ABJC comment letter”), specifically the supporting exhibit by Clark & Associates dated September 24, 2025 (Clark Exhibit) specific to freeway traffic, back-up generators, and Valley Fever.

Ramboll  
2211 Michelson Drive  
Suite 400  
Irvine, CA 92612  
USA

T +1 949 261 5151  
[www.ramboll.com](http://www.ramboll.com)

**INTRODUCTION**

The ABJC comment letter referred to its Exhibit A from Clark & Associates and claimed that the Final Environmental Impact Report (FSEIR) did not address the need for an operational health risk analysis, emissions from back-up generators, and Valley Fever exposure.

The Supplemental Environmental Impact Report (SEIR) and prior responses have previously addressed the issues raised in the ABJC comment letter and the Clark Exhibit. Specifically, the prior response includes a comprehensive discussion of how emergency generators are addressed and how the Project’s proximity to Interstate 5 does not create unevaluated issues. The SEIR provides proper analysis and disclosure of Valley Fever. These issues are addressed further in response to the exhibit by Clark & Associates.

The information in this memo clarifies and adds to the prior responses to comments but does not change the overall analysis or conclusions. These comments do not require any changes to the Air Quality Technical Report or the SEIR.

## ADDITIONAL INFORMATION RELATED TO SPECIFIC COMMENTS

### 1. No Health Risk Assessment of Operational Emissions Is Required Because the Modified Project Has No Sensitive Receptors Near the Freeway

As noted in the published Response to Comments,<sup>1</sup> 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 Technical Report (AQ Report) of the Draft SEIR. The Draft SEIR appropriately accounted for the referenced notice of preparation comment letter from South Coast Air Quality Management District (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.

Specifically, as described in the Draft SEIR, page 5.1-24, and Air Quality Report, Section 4.8, an analysis was performed consistent with the SCAQMD California Environmental Quality Act (CEQA) Handbook<sup>2</sup> and California Air Resources Board (CARB) Air Quality and Land Use Handbook<sup>3</sup> regarding evaluating health risks associated with siting criteria for sensitive receptors. Regarding freeway impacts, the CARB Air Quality and Land Use Handbook recommends health risks if a project sites sensitive receptors within 500 feet of a freeway, which is not the case here. The Modified Project's sensitive receptors are not closer to emissions sources than these minimum distances recommended in the SCAQMD CEQA Handbook or the CARB Air Quality and Land Use Handbook.

In the Clark Exhibit, it refers to a 2013 non-binding document from Los Angeles County Public Health Department (LACDPH)<sup>4</sup> titled "Air Quality Recommendations For Local Jurisdictions Air Quality Recommendations For Local Jurisdictions" that is advisory in nature and non-binding. The 2013 document states "buffer of at least 500 feet should be maintained between the development of new schools, housing or other sensitive land uses and freeways." As noted above, no schools, housing or other sensitive land uses will be located within 500 feet of a freeway for the Project. The Clark Exhibit also lists other "recommendations" from the County that go beyond the suggestions in the 2013 document for sensitive uses within 1,500 feet of a freeway. In any instance, LACDPH has reviewed the Project and SEIR as part of the County's administrative review process.

Additionally, it is also noted that the comment's request is what is commonly termed "CEQA-in-Reverse." As determined in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, Case No. S213478, "that ordinary CEQA analysis is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents." The ABJC comment letter requests for a health risk assessment of the Interstate 5 emissions on to the Project would be an assessment of the environment's impact onto

<sup>1</sup> Entrada South and Valencia Commerce Center (VCC) Project, Final Document, Section 2 Response to Written Comments. Available at: [https://files.ceqanet.lci.ca.gov/115152-16/attachment/tWfPs2wd-E3GqKa4N8AQ4GdvxgFgCqM-gX7KiSqU\\_7kw7IwAQQuKnKivIFtpKPxsO43yrnqPYKrEkDHu0](https://files.ceqanet.lci.ca.gov/115152-16/attachment/tWfPs2wd-E3GqKa4N8AQ4GdvxgFgCqM-gX7KiSqU_7kw7IwAQQuKnKivIFtpKPxsO43yrnqPYKrEkDHu0). Accessed October 2025.

<sup>2</sup> SCAQMD, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, 2005. Available at: <https://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>. Accessed: October 2025.

<sup>3</sup> CARB, *Air Quality and Land Use handbook, a Community Health Perspective*, 2005. Available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>. Accessed: October 2025.

<sup>4</sup> Los Angeles County Department of Public Health, *Air Quality Near Freeways*. 2013. Available at: <https://publichealth.lacounty.gov/eh/docs/safety/air-quality-near-freeways.pdf>. Accessed: October 2025.

the Project, and thus it is not required. Nevertheless, the SEIR has assessed and considered if there may be a health risk posed to the potential future residents of the Project from Interstate 5, as described above, based on expert agency guidance from CARB and SCAQMD and will satisfy the CARB, SCAQMD, and LACDPH guidance.

For these reasons, no revisions to the FSEIR or additional mitigation measures are warranted.

**2. Draft SEIR’s Analysis for Back-up Generators was Appropriate, and No Additional Analysis or Mitigation is Required.**

The Clark Exhibit makes comments regarding potential impacts from back-up generators and fire pumps without providing Project-specific information indicating these impacts have the potential to be significant for the Project. Although the comments are speculative and lack detail, we provide a technical response with the following.

As detailed in the previous Response to Written Comments, the Modified Project would include fewer residential back-up generators than the 2017 Project. This reduction is due to the Modified Project comprising 151 fewer dwelling units, combined with data from a 2020 CARB report indicating that one in eight California households owns a generator.<sup>5</sup> Furthermore, it should be noted that emergency generators and fire pumps are not typically installed at residential land uses and the Project has not proposed emergency generators or fire pumps for the new housing units.

The ABJC comment letter cites and relies on Clark Exhibit’s to assert that the Modified Project failed to analyze emergency generators associated with commercial operations, including the planned hotel. However, the commenter has not provided any evidence that emergency generator use, if any, would be higher for the Modified Project compared to the 2017 Project. As described in the Draft SEIR, Air Quality Report, and previous Responses to Written Comments, the Modified Project shows a decrease in operational emissions for all criteria pollutants, with minor changes in proposed land uses that would decrease the total square footage compared to the 2017 Project. In other words, as detailed in the Draft SEIR, emissions that may result in health risks will be lower for the Modified Project than the 2017 Project due to enhanced regulatory standards and a cleaner equipment fleet based on meeting stricter environmental requirements. The SEIR also explains that, in addition, the Modified Project will further implement Project Design Features that will cut criteria pollutants by 50-80 percent depending on the pollutant compared to the estimates of the 2017 Project in the State-certified Environmental Impact Report (EIR).

With respect to generator use, the prior Response to Written Comments demonstrate that even if the commenter’s suggestions were accepted, the Modified Project will reduce emissions for emergency generators at residential uses within the Project. For non-residential generators, the prior Response to Comments also clarified that the specific land uses planned at the Project Site are not expected to install emergency diesel generators, and even if some commercial sites install emergency generators as a precaution, those generators would likely exceed 50 hp in rating and would therefore be subject to various regulations. Nonetheless, the ABJC comment letter and Clark Exhibit continue to assert that the response does not address emergency generators and fire pumps for non-residential uses, particularly related to the proposed hotel use. The commenters do not provide any specific information or details

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<sup>5</sup> 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](https://ww2.arb.ca.gov/sites/default/files/2020-01/Emissions_Inventory_Generator_Demand%20Usage_During_Power_Outage_01_30_20.pdf). Accessed: October 2025.

indicating the changes in the Modified Project would result in significant impacts. In any instance, to address this comment, Ramboll completed an analysis demonstrating that the Modified Project would still have an overall emission reduction if assuming additional emergency back-up generators and fire pumps for commercial land use such as a hotel. The emissions *reductions* are shown in **Table 1**. For the purpose of this analysis, a total of three 165kW industrial back-up generators and three diesel fire pumps with similar power are conservatively estimated for the Modified Project.<sup>6</sup> Their average daily operations were derived from applicable permit conditions from SCAQMD rules (i.e., Rule 1110.2<sup>7</sup> and Rule 1470,<sup>8</sup> respectively).

**Table 1. Emissions Changes from Emergency Generators and Fire Pumps for Residential and Commercial Uses (Conservative Assumptions)**

	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Reduction in Emissions from Residential Generators (lb/day) <sup>1</sup>	-0.35	-6.56	-7.34	-0.41	-0.04	-0.04
Increase in Emissions from Non-residential Generator (lb/day) <sup>2</sup>	0.12	2.27	2.09	0.17	0.01	0.01
Increase in Emissions from Non-residential Diesel Fire Pumps (lb/day) <sup>3</sup>	0.03	0.57	0.52	0.04	0.00	0.00
Net Generator Change (lb/day)	-0.20	-3.72	-4.73	-0.20	-0.03	-0.03

Notes:

<sup>1</sup> Assuming one hour per day of emergency generator operation for 18 emergency generators. Emission factors for CO, NO<sub>x</sub>, PM, and volatile organic compounds (VOCs) are based on Tier 4 emissions standards, assuming that the “NMHC + NO<sub>x</sub>” standard can be allocated as 95 NO<sub>x</sub> and 5 percent VOC. Emission factor for sulfur oxide (SO<sub>x</sub>) is a default from South Coast AQMD.

<sup>2</sup> Assuming 200 hours per year of emergency generator operation for three 165 kW industrial emergency generators. The operation hour is based on SCAQMD Rule 1110.2 permit condition. The number and size of back-up generator was conservatively estimated based available online sources. Emission factors for CO, NO<sub>x</sub>, PM, and VOC are based on Tier 4 emissions standards, assuming that the “NMHC + NO<sub>x</sub>” standard can be allocated as 95 NO<sub>x</sub> and 5 percent VOC. Emission factor for SO<sub>x</sub> is a default from South Coast AQMD.

<sup>3</sup> Assuming 50 hours per year of fire pump operation for three 165 kW fire pumps. The operation hour is based on SCAQMD Rule 1470 permit condition. The number and size of fire pump was conservatively estimated to be the same as diesel back-up generator. Emission factors for CO, NO<sub>x</sub>, PM, and VOC are based on Tier 4 emissions standards, assuming that the “NMHC + NO<sub>x</sub>” standard can be allocated as 95 NO<sub>x</sub> and 5 percent VOC. Emission factor for SO<sub>x</sub> is a default from South Coast AQMD.

<sup>6</sup> Size and number of non-residential fire pumps are conservatively estimated to be the same as backup generators.

<sup>7</sup> SCAQMD. *Rule 1110.2 – Emissions from gaseous- and liquid-fueled engines*. 2019. Available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1110-2.pdf>. Accessed: October 2025.

<sup>8</sup> SCAQMD. *Rule 1470 – Requirements for stationary diesel-fueled internal combustion and other compression ignition engines*. 2016, available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>. Accessed: October 2025.

### 3. The SEIR has Adequately Addressed Valley Fever

Ramboll has analyzed and addressed the Valley Fever impact to the Modified Project in Section 4.6 of the Air Quality Technical Report (AQ Report), included as Appendix 5.1 of the SEIR. As described in the AQ Report, Valley Fever (*Coccidioidomycosis*) is caused by inhalation of spores from *Coccidioides* that occur naturally in native soils in arid and semi-arid regions. The AQ Report provides background information on the disease, including Valley Fever cases over recent years in Los Angeles County and describes a quantified range of Valley Fever symptoms based on information from public health agencies. Specifically, the AQ Report notes that approximately 60 percent of exposed individuals show no symptoms, most of the remainder experience mild, flu-like symptoms, approximately 5 to 10 percent may experience longer-term respiratory or systemic effects, and about 1 percent of cases may result in severe complications if the infection becomes disseminated (AQ Report, p. 40).

The AQ Report further explains that potential exposure is related to soil-disturbing activities that may release spores into the air. Because the Modified Project would involve less overall grading and would not expand the previously approved grading area, the potential for soil disturbance—and thus the potential for exposure to *Coccidioides*—would be reduced compared to the 2017 Project. Based on this analysis, the AQ Report concludes that the Modified Project would not result in any new or increased risk of Valley Fever infection or other health effects. Accordingly, the SEIR determines that potential impacts related to Valley Fever would remain less than significant. A determination of no significant impact indicates that no additional mitigation measures are required. Because the SEIR concludes, based on substantial evidence, that the Modified Project would not result in any increased impact related to Valley Fever, no further mitigation measure is necessary.

In addition, the SEIR identifies and incorporates applicable regulatory requirements and standard construction practices that further minimize dust generation, which is the primary mechanism by which Valley Fever spores could become airborne. Specifically, the SEIR describes SCAQMD Rule 403 (Fugitive Dust) as a mandatory requirement applicable to all grading and earthmoving activities (Draft SEIR, p. 5.1-37). The Modified Project will follow all dust suppression and control measures required by Rule 403, including requirements for watering exposed surfaces, stabilizing access roads, limiting vehicle speeds, and ceasing earthmoving operations during high wind conditions.

A Fugitive Dust Mitigation Plan prepared by Ramboll and included as Appendix D to the AQ Report incorporates best management practices consistent with SCAQMD guidance. Compliance with Rule 403 and implementation of the Fugitive Dust Mitigation Plan are also reinforced through multiple SEIR mitigation measures (MM-AQ-29, MM-AQ-30, MM-AQ-32, MM-AQ-33, MM-AQ-70, and MM-AQ-71), all of which include measures to control Fugitive Dust emissions. Implementation of these measures will ensure that dust—and, by extension, the potential for Valley Fever spores to become airborne—is effectively minimized during all construction phases.

The Clark Exhibit also stated that *Coccidioides* “are approximately 5 times smaller than typical PM<sub>10</sub> particles... posing a significant risk to both onsite workers and nearby communities.” His assertion that *Coccidioides* pose a significant risk to nearby communities is highly speculative and unsupported by evidence or data. Nevertheless, it is important to note that fungal spores, despite their small aerodynamic size, are transported and dispersed in the same manner as other airborne particles. Therefore, the best management practices outlined in the Fugitive Dust Mitigation Plan, along with the Modified Project’s compliance with Fugitive Dust regulations, also address potential offsite exposure.

Consequently, the SEIR provides substantial evidence demonstrating that the Modified Project would not result in significant health impacts related to Valley Fever. The combination of reduced grading activity relative to the approved Project, mandatory compliance with SCAQMD Rule 403, and the implementation of best management practices listed in the Fugitive Dust Mitigation Plan ensures that the potential for increased exposure to *Coccidioides* is less than significant. Therefore, the SEIR has adequately addressed Valley Fever, and no additional analysis or mitigation is warranted; however, for reference, additional information is provided below.

**a. The Potential for Valley Fever in the Region is a Known Issue and Has Been Known Since Prior to State-certified EIR.**

In soil, *Coccidioides* grow as a network of branching hyphae. Small rodents and other animals are thought to serve as a medium for *Coccidioides* growth. As the hyphae grow, they produce chains of asexual spores known as arthroconidia, which become airborne when the soil is disturbed.

*Coccidioides* prevalence in air is highly variable. More studies are needed to better understand how they are transported and dispersed in ambient conditions, once disturbed and/or under high wind events. According to the National Institutes of Health, *Coccidioides* distribution in air and soil are sporadic and uneven. The absence of commercially available air and/or soil sampling methods, and the absence of regulatory-approved laboratory analytical methods, makes worksite-specific characterization of *Coccidioides* not feasible. It is not uncommon, even in studies sampling in highly endemic areas, for the fungus to be detected in few or none of the soil samples. Current regulations and guidance do not recommend nor require sampling because of these factors.

The Clark Exhibit asserted that the FSEIR did not address concerns over exposure to Valley Fever in the region. As noted above, the SEIR acknowledges that Valley Fever (coccidioidomycosis) is a recognized health concern in the region and has discussed this in Section 4.6 of the Air Quality Technical Report (AQ Report), included as Appendix 5.1 of the SEIR. The potential risk of Valley Fever, including related to a development Project, has been a known issue for decades, even predating the publication of the State -certified EIR.<sup>9,10,11</sup> Clark Exhibit also acknowledges Valley Fever risks date back to at least 1968, based on the studies it references (e.g., footnote 8 of the Clark Exhibit). Therefore, risks related to Valley Fever were known or could have been known at the time the State-certified EIR was prepared.

In addition, the sources cited in the Clark Exhibit should be interpreted with caution when applied to the proposed Project. First, while the Project Site is located in Service Planning Area (SPA) 2 of Los Angeles County, which reported the highest number of Valley Fever cases (483) in 2022 as noted in the Clark Exhibit, it is noteworthy that SPA 2 also has the largest population in the County.<sup>12</sup> On a per-capita basis, SPA 2 actually has less than one-third the cases of SPA 1. Therefore, the Clark Exhibit is

<sup>9</sup> Centers for Disease Control and Prevention (CDC). *Increase in Coccidioidomycosis — California, 2000–2007. Morbidity and Mortality Weekly Report (MMWR)* 58, no. 5 (2009): 105–109. <https://www.cdc.gov/mmwr/preview/mmwrhtml/mm5805a1.htm>. Accessed: October 2025

<sup>10</sup> Charles Edward Smith. "Epidemiology of Acute Coccidioidomycosis with Erythema Nodosum ('San Joaquin' or 'Valley Fever')." *American Journal of Public Health* 30, no. 6 (1940): 600–611. <https://doi.org/10.2105/AJPH.30.6.600>. Accessed: October 2025

<sup>11</sup> T.N. Kirkland. "Coccidioidomycosis: A Reemerging Infectious Disease." *Emerging Infectious Diseases* 2, no. 3 (1996): 192–199. <https://doi.org/10.3201/eid0203.960305>. Accessed: October 2025

<sup>12</sup> Los Angeles County Department of Public Health, *Los Angeles County Population Estimates*. 2022. Available at: <http://www.publichealth.lacounty.gov/epi/docs/2022-LAC-Population-8RE.pdf>. Accessed: October 2025

misrepresenting the relative risk in SPA 2 by selectively reporting only total case counts without providing the population context.

And second, the comment cites the Antelope Valley study to suggest a higher risk of exposure from soil disturbance. However, this comparison is not directly applicable or relevant. The Antelope Valley study assessed soil disturbance across a much larger area, encompassing multiple projects conducted between 2000 and 2014, and the study area is located in the Mojave Desert—a high desert basin with environmental conditions distinct from those at the Project Site.

In summary, while Valley Fever is a known regional issue, the data and examples cited in the Clark Exhibit is not accurately representative of the potential risk associated with the Modified Project, which, as indicated above, was analyzed in the SEIR and determined to be less than significant.

**b. The Project Is Further Subject to Substantial Regulatory Oversight and Best Practices Established by Cal/OSHA to Manage Exposure Risk of Valley Fever Identified by Clark and Associates.**

As elaborated in Response 3 above, the Clark Exhibit incorrectly claims that the Modified Project does not sufficiently prevent exposure to *Coccidioides*. The Modified Project will reduce grading activity relative to the 2017 Project, comply with SCAQMD Rule 403, and implement best management practices listed in the Fugitive Dust Mitigation Plan. All these measures together ensure that the relative exposure to *Coccidioides* is less than the 2017 Project and therefore less than significant.

Additionally, the Modified Project will also fully comply with applicable Cal/OSHA regulations regarding Valley Fever. Specifically, Cal/OSHA regulates worker protection and harmful exposures via the following California Code of Regulations, Title 8, sections:

- Section 342 - Reporting Work-Connected Fatalities and Serious Injuries
- Section 3203 - Injury and Illness Prevention Program
- Section 5141 - Control of Harmful Exposures to Employees
- Section 5144 - Respiratory Protection
- Section 14300 - Employer Records of Occupational Injury or Illness (Log 300)

These standards are applicable to the regulation of worker exposures to *Coccidioides* and define employer responsibilities for identifying and communicating occupational hazards to affected employees, implementation of site-specific written programs and controls to minimize employee’s exposures, and that require immediate reporting of serious injury, illness or death from Valley Fever.

Training is a critical component of the site-specific Injury and Illness Prevention Program and must include a review of key definitions related to Valley Fever, high-risk areas at the worksite, a review of the specific job tasks and conditions that increase potential for exposure, personal risk factors, water-based dust suppression protocols, hygiene practices, the importance of early detection, diagnosis and treatment, how to recognize signs and symptoms, reporting symptoms, treatment and prognosis.

Similarly, employers in the construction industry are also required to follow the requirements to train workers on prevention in California Labor Code 6709.

In summary, the Modified Project is also subject to substantial regulatory oversight and best practices established by Cal/OSHA and can effectively protect workers from exposure risk of Valley Fever.

Please feel free to contact the undersigned if you have any further questions. Thank you for the opportunity to assist you with these matters.

Sincerely,



**Eric C. Lu, MS, PE**  
Regional Director

D 949.798.3650  
[elu@ramboll.com](mailto:elu@ramboll.com)

TW:ta

## **Entrada South and Valencia Commerce Center Project**

### **Additional Information Related to Responses to Comment Letters Submitted Prior to Regional Planning Commission Hearing**

#### **A. Supporters Alliance For Environmental Responsibility (SAFER)**

This document provides additional information regarding the responses to the comment letter submitted on behalf of Supporters Alliance For Environmental Responsibility (SAFER) on September 29, 2025, regarding the Entrada South and Valencia Commerce Center Project being heard before the Los Angeles County Regional Planning Commission on October 1, 2025. This additional information clarifies and adds to the prior responses to comments but does not change the overall analysis or conclusions. These comments do not require any changes to the SEIR.

The SAFER comment letter repeatedly asserted that the Entrada South / VCC Project Supplemental Environmental Impact Report (SEIR) did not appropriately disclose the project's significant and unavoidable impacts. These comments are not correct. The SEIR accurately and appropriately described and disclosed the project's significant and unavoidable impacts consistent with CEQA. The SEIR clearly discloses, throughout Section 2.0 (Executive Summary), Section 5.0 (Environmental Impact Analysis), and Section 7.0 (Other Environmental Considerations), which impacts were significant and unavoidable in the State-certified EIR and whether the Modified Project would cause any new or substantially more severe significant impacts.

As discussed in Topical Response 1 of the SEIR, when preparing a subsequent CEQA document, the lead agency focuses on whether the modified project may result in new or substantially more severe significant impacts compared to the original project based on changes to the project, changes in circumstances, or new information that was not known or could not have been known at the time of the prior EIR. As described in Section 3.0, Project Description, of the SEIR, the Modified Project Site is located within the development area analyzed by the State-certified EIR, the State-approved Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP), which was the subject of an EIR and the Additional Environmental Analysis that was certified by the California Department of Fish and Wildlife (CDFW) in 2017 (SCH No. 2000011025; "State-certified EIR"). The residential and commercial development of the Modified Project as currently proposed includes only minor changes and refinements and environmental enhancements as compared to the 2017 Project. Accordingly, the SEIR appropriately discloses whether the prior 2017 Project has significant and unavoidable impacts as identified in the State-certified EIR and then evaluates whether the Modified Project would result in any new or substantially more severe significant impacts.

Air quality is illustrative of how the SEIR analyzes and discloses impacts. The following provides a detailed example of how Air Quality significant and unavoidable impacts are described and analyzed in the SEIR.

First, the Draft SEIR describes the 2017 Project's significant and unavoidable air quality impacts on pages 2.0-24 and 2.0-25 as follows:

“The State-certified EIR determined that construction in the Entrada South and VCC Planning Areas would generate emissions of volatile organic compounds (VOC), nitrogen oxides (NOX), respirable particulate matter (PM10), and fine particulate matter (PM2.5) that exceed the SCAQMD thresholds of significance. Thus, construction-related air quality impacts would be significant, as concluded in the State-certified EIR. Mitigation Measures RMDP/SCP-AQ-1 through RMDP/SCP-AQ 12 and measure VCC-AQ-1 for VCC construction would reduce construction-related emissions to some extent; however, the State-certified EIR determined that such impacts would remain significant and unavoidable within each planning area. The State-certified EIR also found that cumulative impacts related to these pollutants also would be significant and unavoidable. Similarly, the State-certified EIR concluded localized construction emissions of NO2, PM10, and PM2.5 would be significant and unavoidable.

The State-certified EIR indicated operation of the land uses proposed within the Entrada South and VCC Planning Areas would generate operational emissions of VOC, NOX, CO, PM10, and PM2.5 that exceed the thresholds of significance, and as such operational air quality impacts would be significant. The State-certified EIR assumed air emissions associated with the daily operations using URBEMIS2007. Mitigation Measures RMDP/SCP-AQ-13 through RMDP/SCPAQ-16 and measure VCC-AQ-2 for VCC operations would reduce emissions, but operational air quality impacts would remain significant and unavoidable, as determined by the State-certified EIR. Impacts related to the exposure of sensitive receptors to substantial pollutant concentrations and cumulative impacts likewise would be significant and unavoidable, as concluded in the State-certified EIR.”

Table 2.0-2 of the Draft SEIR summarizes each significant and unavoidable impact of the 2017 Project and the corresponding Modified Project conclusion, such as shown on the following graphic:

**Table 2.0-2  
Summary of Environmental Impacts, Mitigation Measures, and Resulting Levels of Significance**

Environmental Issue and Threshold	State-certified EIR Significance Conclusion	Modified Project Impact Conclusion	Applicable Mitigation Measures <sup>a</sup>
<b>A. AIR QUALITY</b>			
Threshold 5.1-1: Would the Project conflict with or obstruct Implementation of applicable air quality plans of the South Coast AQMD (SCAQMD)?	Less Than Significant	No New Significant Impact	<p><b>Previously Approved Applicable Mitigation from the State-certified EIR</b></p> <p><b>RMDP/SCP-AQ-3:</b> Suspend the use of all construction equipment during first-stage smog alerts.</p> <p><b>RMDP/SCP-AQ-4:</b> Use electricity or alternative fuels for on-site mobile equipment instead of diesel equipment, to the extent feasible.</p> <p><b>RMDP/SCP-AQ-5:</b> Maintain construction equipment by conducting regular tune-ups according to the manufacturer's recommendations.</p> <p><b>RMDP/SCP-AQ-6:</b> Use electric welders to avoid emissions from gas or diesel welders, to the extent feasible.</p> <p><b>RMDP/SCP-AQ-7:</b> Use on-site electricity or alternative fuels rather than diesel-powered or gasoline-powered generators, to the extent feasible.</p> <p><b>RMDP/SCP-AQ-12a.</b> Construction shall be planned in such a way as to minimize heavy construction activity involving the use of diesel-fueled construction equipment within 500 meters of an occupied residence to the extent practical. Heavy construction activity that occurs within 500 meters of an occupied residence that involves the use of diesel-fueled construction equipment shall prohibit non-essential idling and shall utilize equipment certified to the Tier 2 or newer emission standard. Equipment shall be routed in such a way as to minimize travel within 500 meters of an occupied residence to the extent</p>
Threshold 5.1-2: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			
<i>Regional Emissions</i>			
Construction	<b>Significant and Unavoidable<sup>b</sup></b>	No Substantial Increase in Severity of Impact	
Operation	<b>Significant and Unavoidable<sup>b</sup></b>	No Substantial Increase in Severity of Impact	
<i>Localized Emissions</i>			
Construction	<b>Significant and Unavoidable<sup>b</sup></b>	No Substantial Increase in Severity of Impact	
Operation	Less Than Significant	No New Significant Impact	
Threshold 5.1-3: Would the Project expose sensitive receptors to substantial pollutant concentrations?			
<i>Localized Emissions</i>			
Construction	<b>Significant and Unavoidable<sup>b</sup></b>	No Substantial Increase in Severity of Impact	

For additional specifics, each topical section of the SEIR includes a detailed summary of the State-certified EIR's impact conclusions that describe the significant and unavoidable impacts of the 2017 Project, such as pages 5.1-36 to 5.1-37 of the Draft SEIR describing Air Quality:

“The State-certified EIR determined that construction in the Entrada South and VCC Planning Areas would generate emissions of volatile organic compounds (VOC), nitrogen oxides (NOX), respirable particulate matter (PM10), and fine particulate matter (PM2.5) that exceed the SCAQMD thresholds of significance. Thus, construction-related air quality impacts would be significant, as concluded in the State-certified EIR. Mitigation Measures RMDP/SCP-AQ-1 through RMDP/SCP-AQ-12 and measure VCC-AQ-1 for VCC construction would reduce construction-related emissions to some extent; however, the State-certified EIR determined that such impacts would remain significant and unavoidable within each planning area. The State-certified EIR also found that cumulative impacts related to these pollutants also would be significant and unavoidable. Similarly, the State-certified EIR concluded localized construction emissions of NO2, PM10, and PM2.5 would be significant and unavoidable. The State-certified EIR, Section 4.7, relied upon OFFROAD2007 emission factors and other

parameters provided in URBEMIS2007.24 Even with implementation of the mitigation measures RMDP/SCP-AQ-12 and -12A as described in the State-certified EIR, construction equipment was assumed by the State-certified EIR to include Tier 1 and Tier 2 equipment.

The State-certified EIR indicated operation of the land uses proposed within the Entrada South and VCC Planning Areas would generate operational emissions of VOC, NOX, CO, PM10, and PM2.5 that exceed the thresholds of significance, and as such operational air quality impacts would be significant. The State-certified EIR assumed air emissions associated with the daily operations using URBEMIS2007. Mitigation Measures RMDP/SCP-AQ-13 through RMDP/SCP-AQ-16 and measure VCC-AQ-2 for VCC operations would reduce emissions, but operational air quality impacts would remain significant and unavoidable, as determined by the State-certified EIR. Impacts related to the exposure of sensitive receptors to substantial pollutant concentrations and cumulative impacts likewise would be significant and unavoidable, as concluded in the State-certified EIR.

With respect to health risk, the State-certified EIR concluded that health impacts associated with construction of the 2017 Project would be less than significant for both cancer and noncancer risks. Moreover, implementation of air quality Mitigation Measures RMDP/SCP-AQ-1, RMDP/SCP-AQ-3 through RMDP/SCP-AQ-7, RMDP/SCP-AQ-10, and RMDP/SCP-AQ-11, which were recommended to mitigate criteria pollutant impacts, would further reduce health risk impacts.

As also evaluated in the State-certified EIR, development of the Entrada South and VCC Planning Areas would not conflict with or obstruct implementation of the SCAQMD's AQMP. In addition, no odor-generating activities would result from construction or operation of the Entrada and South VCC Planning Areas, nor from the creation of the spineflower preserve within Entrada South. Therefore, such impacts were determined in the State-certified EIR to be less than significant.”

Further, the Draft SEIR also includes multiple tables presenting modeling results that clearly show the significant and unavoidable impacts of the 2017 Project by pollutant category and emissions levels (e.g., for VOCs, NOx, CO, Sox, PM10, and PM2.5), while identifying whether the emissions exceed the SCAQMD significance thresholds, as shown on the following example Table 5.1-5. The table also includes the Modified Project's net change in emissions by pollutant category and emissions levels (e.g., for VOCs, NOx, CO, Sox, PM10, and PM2.5) and demonstrates that those emissions are below the SCAQMD significance thresholds.

**Table 5.1-5  
Estimate of Incremental Change in Maximum Regional Project Daily Operational Emissions—  
Entrada South Planning Area (Winter Emissions)<sup>a</sup>**

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>2017 Project (State-certified EIR Air Quality Analysis)</b>						
Total Unmitigated Emissions	174	106	647	1.7	325	64
Total Mitigated Emissions <sup>b</sup>	170	95	613	1.7	310	61
SCAQMD Significance Threshold	55	55	550	150	150	55
Significant Impact Identified in the State-Certified EIR Air Quality Analysis?	Yes	Yes	Yes	No	Yes	Yes
<b>Modified Project (Incremental Change in Emissions from State-certified EIR Air Quality Analysis)</b>						
Total Unmitigated Emissions	107	92	644	2	61	17
Total Mitigated Emissions <sup>c</sup>	87	54	285	1	59	16
<b>Net Change</b>	<b>(83)</b>	<b>(41)</b>	<b>(328)</b>	<b>(1)</b>	<b>(251)</b>	<b>(45)</b>
<b>SCAQMD Significance Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>New Significant Impact or Substantial Increase for the Modified Project?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<p>Numbers may not add up exactly due to rounding.</p> <p><sup>a</sup> The CalEEMod model printout sheets and/or calculation worksheets are presented in <b>Appendix 5.1</b> (CalEEMod Output) of this SEIR.</p> <p><sup>b</sup> Total mitigated emissions include the air quality mitigation identified in the State-certified EIR, where readily quantifiable.</p> <p><sup>c</sup> Total mitigated emissions include the air quality co-benefits of the Net Zero Newhall mitigation.</p> <p>Source: RAMBOLL, 2024.</p>						

In sum, the above examples of one topic area—Air Quality—provide additional information supporting the prior response that the SEIR accurately and appropriately describes and discloses the project’s significant and unavoidable impacts. The SEIR discloses the 2017 Project’s significant and unavoidable impacts and analyzed and disclosed whether the Modified Project would result in new or substantially more severe significant impacts based on changes to the project, changes in circumstances, or new information that was not known or could not have been known at the time of the prior EIR.

For reference, as described in Section 2.0 of the SEIR and in topical sections, the following significant and unavoidable impacts are identified in the SEIR:

- **Air Quality:** The State-certified EIR determined that construction in the Entrada South and VCC Planning areas would generate emissions of volatile organic compounds (VOC), nitrogen oxides (NOX), respirable particulate matter (PM10), and fine particulate matter (PM2.5) that exceeded the South Coast Air Quality Management District (“SCAQMD”) thresholds of significance. The State-certified EIR also found that cumulative impacts related to these pollutants also would be significant and unavoidable. As described in the SEIR, the Modified Project would not result in any new or

substantially more severe significant impacts related to air quality as compared to the State-certified EIR.

- Land Use: The State-certified EIR determined a 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 site, which would conflict with the site's then existing agricultural zoning. However, following the certification of the State-certified EIR, this conflict has been eliminated because the agricultural zoning for the Spineflower preserve within the Entrada South Planning Area was removed by the updated Santa Clarita Valley Area Plan. As described in the SEIR, the Modified Project would not result in any new or substantially more severe significant impacts related to land use as compared to the State-certified EIR.
- Noise: The State-certified EIR identified significant and unavoidable cumulative operational traffic noise impacts along 11 roadway segments based on the full development analyzed in the State-certified EIR. As described in the SEIR, the Modified Project would not result in any new or substantially more severe significant impacts related to noise as compared to the State-certified EIR.
- Wildfire: The State-certified EIR determined that cumulative wildfire impacts would be significant and unavoidable. In reaching this conclusion, the State-certified EIR identified mitigation measures that would reduce cumulative impacts if implemented by the projects considered in the cumulative analysis. Since the time of the preparation of the State-certified EIR, the measures identified in the State-certified EIR are now required on new development as a matter of regulatory compliance due to the increased stringency of applicable Fire and Building Codes and other regulatory requirements related to wildfire safety. As described in the SEIR, the Modified Project would not result in any new or substantially more severe significant impacts related to wildfire as compared to the State-certified EIR.
- Solid Waste: The State-certified EIR identified significant and unavoidable cumulative solid waste impacts related to increases in the generation of solid waste that requires landfill disposal. At the time of publication of the State-certified EIR, the County had not identified an adequate supply of landfill space beyond 2020. Accordingly, the increase in solid waste disposal was considered a significant and unavoidable impact. However, since the State-certified EIR was certified, adequate disposal capacity through 2036 has been identified by the County. As described in the SEIR, the Modified Project would not result in any new or substantially more severe significant impacts related to solid waste.

**B. Coalition for Responsible Equitable Economic Development Los Angeles (CREED LA)**

This document provides additional information regarding the response to the comment letter submitted on behalf of Coalition for Responsible Equitable Economic Development Los Angeles (CREED LA) on September 30, 2025, regarding the Entrada South and Valencia Commerce Center Project being heard before the Los Angeles County Regional Planning Commission on October 1,

2025. This additional information clarifies and adds to the prior responses to comments but does not change the overall analysis or conclusions. These comments do not require any changes to the SEIR.

The CREED comment letter made various, unsupported statements about the County being unable to make findings required by the County Code, including that the County could not make findings related to “County Code Section 22.166.05, a Discretionary Housing Permit.” These comments are incorrect.

County staff has identified the required housing permit as an Administrative Housing Permit under County Code Chapter 22.166. County Code section 22.166.040 provides “an application that meets all of the requirements for an Administrative Housing Permit shall be approved,” subject only to limited exceptions, which are not applicable here. As described in the staff report presented to the Regional Planning Commission, the Modified Project complies with the Administrative Housing Permit requirements.

The commenter asserts without explanation that findings for a Discretionary Housing Permit are needed. As noted above, and to clarify the prior response to this comment, the Modified Project includes an Administrative Housing Permit No. RPPL2024000343 and not a Discretionary Housing Permit. The commenter has not provided evidence or explanation on why the Discretionary Housing Permit findings in Section 22.166.05 would apply, which is not the case.

However, to provide additional information for purposes of the response to this comment, it is noted that the distinction between an Administrative Housing Permit and a Discretionary Housing Permit does not affect the Board considering the Modified Project because the Modified Project includes multiple discretionary approvals that require Board review and approval. The Board review is supported by substantial evidence in the administrative record, including related to the Conditional Use Permit, Parking Permit, Oak Tree Permit, Vesting Tentative Tract Map, Zone Change, and Development Agreement, the Final SEIR, staff reports, and the associated findings recommended by the Regional Planning Commission.

Further, it is noted that even if the Discretionary Housing Permit findings were applicable as the commenter asserts (which is not the case), there is substantial evidence in the record to satisfy the findings for a Discretionary Housing Permit pursuant to County Code section 22.166.050(B)(2).<sup>1</sup> Specifically, the Final SEIR, findings recommended by the Regional

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<sup>1</sup> County Code section 22.166.050(B)(2), Findings, provides:

“a. The project will be consistent with the General Plan.

b. The project will not: i. Adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area or within the project; ii. Be materially detrimental to the use, enjoyment, or valuation of property of other persons located in the vicinity of the site; and iii. Jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare.

c. The project site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.

Planning Commission, and other evidence in the record, such as the staff report, map applications, and Transportation Impact Analysis, demonstrate that the Modified Project:

- is consistent with the General Plan and Santa Clarita Valley Area Plan (Section 22.166.050(B)(2)(a));
- must comply with mitigation measures and regulatory conditions, as reflected in the Final SEIR, and conditions of approval, that ensure the Modified Project will not result in new or substantially more severe significant impacts compared to the 2017 Project and will address air quality, health risk, noise, and other topics consistent with County standards and therefore will not affect the health, peace, comfort, be materially detrimental to the use, enjoyment, or valuation of property of others, or welfare, or jeopardize, endanger, or otherwise constitute a menace to the public health, safety, or general welfare (Section 22.166.050(B)(2)(b));
- includes sites that are adequate in size, shape, and service infrastructure to integrate the proposed uses and amenities as shown on the VTPM and VTTM applications (Section 22.166.050(B)(2)(c));
- includes sites that are adequately served by highways and streets of sufficient width to carry the kind and quantity of traffic the proposed uses would generate and by other public or private service facilities as demonstrated in the project's Transportation Impact Analysis (Section 22.166.050(B)(2)(d));
- is complimentary to the surrounding area in terms of land use patterns and design by integrating with the adjacent Newhall Ranch Specific Plan and other nearby communities (Section 22.166.050(B)(2)(e));
- has not requested the use of incentives, waivers, or reductions of development standards as part of the current entitlements (Section 22.166.050(B)(2)(f));
- is contributing to satisfying the affordable housing needs of the unincorporated County through the affordable housing program included in the Development Agreement that exceeds the requirements of the Inclusionary Housing Ordinance (Section 22.166.050(B)(2)(g)).

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d. The project site is adequately served: i. By highways or streets of sufficient width, and improved, as necessary, to carry the kind and quantity of traffic such use would generate; and ii. By other public or private service facilities, as are required.

e. The project is complimentary to the surrounding area in terms of land use patterns and design.

f. Any incentives, waivers, or reductions of development standards will contribute to the use and enjoyment of persons residing within the project.

g. The project will contribute to satisfying the affordable housing needs of the unincorporated areas of Los Angeles County.”

Accordingly, contrary to the comment, substantial evidence supports the County's findings.

**Date:** November 2025

**To:** Eyestone Environmental

**From:** Christ Kirikian  
Partner | Director of Air Quality & Acoustics

**Subject:** Additional Information Related to Response to Comments: Entrada South and Valencia Commerce Center Project (SCH No. 2000011025), Western States Regional Council of Carpenters

Western States Regional Council of Carpenters submitted a comment letter to the County of Los Angeles Regional Planning Commission on September 30, 2025 regarding the above-stated project (WSRCC Letter). Written responses were provided to the WSRCC Letter and posted on the County's website. This memo provides additional information related to those responses, in particular, information addressing items raised by a letter from Wilson Ihrig, dated September 24, 2025, which was attached to the WSRCC Letter. The information in this memo clarifies and adds to the prior responses to comments but does not change the overall analysis or conclusions. The comments do not require any changes to the Noise Study or SEIR.

### **Wilson Ihrig Comment 3-1**

As requested, we have reviewed the information and noise impact analysis for the Final Supplemental Environmental Impact Report (FSEIR) for the Entrada South and VCC Project in Valencia, California, State Clearinghouse Number 2000011025. This letter is based on the responses to our letter dated February 12th 2025, based on comments 7-22 through 7-25, as well as 7-55 through 7-65.

### **Additional Information in Response to Wilson Ihrig Comment 3-1**

No further response is needed to this introductory comment.

### **Wilson Ihrig Comment 3-2**

These comments summarize our concerns regarding the potential for groundborne noise impacts at the Grace to You Christian Ministry located in the building at 28001 Harrison Parkway. The comment details how construction vibration was analyzed at the site, showing no potential for damage to structures. The comment then includes an analysis of groundborne noise for potential impacts to radio operations based on traffic noise. The FSEIR concludes that the potential noise level of 37 dBA is 13.6 dBA lower than existing groundborne roadway levels.

### **Additional Information in Response to Wilson Ihrig Comment 3-2**

The comment summarizes findings presented in the FSEIR regarding construction vibration and groundborne noise at the Grace to You Christian Ministry. No further response is necessary.

### **Wilson Ihrig Comment 3-3**

The response does not accurately categorize groundborne noise. The ‘FTA conversion factor’ referenced in the FSEIR is intended to convert from “ground-borne vibration levels to ground-borne noise levels” (FTA<sup>1</sup>, page 145) not from an outdoor noise level to an indoor noise level, as the FEIR erroneously applies. Groundborne noise is the phenomenon of vibration being transmitted through the ground that then radiates into building structures. This is usually heard as a low rumble, as opposed to the whoosh of traffic. The CNEL is already a noise level; there is no conversion from the exterior noise to the noise caused by vibrations, as the CNEL does not categorize vibration levels. Additionally, traffic produces low source vibration levels, so groundborne noise is rarely a problem, unlike for high vibration sources such as construction equipment or trains. This is for two reasons: vehicle suspensions and tires act as dampers, isolating most vibration before it reaches the ground, and the frequency content is typically higher, which is not transmitted as efficiently through soil. As it stands, the FSEIR’s analysis does not accurately categorize current noise levels heard within the Grace to You recording studios. We reiterate our comment that vibration from vibratory rollers propagating as noise into the nearby recording studio has the potential to result in a significant impact, and recommend including mitigation measures such as coordination between Grace to You recording schedules and high-vibration construction activities within a certain buffer zone.

### **Additional Information in Response to Wilson Ihrig Comment 3-3**

The commenter mischaracterizes the application of the FTA guidance as presented in the FSEIR. The FTA Transit Noise and Vibration Impact Assessment Manual (September 2018) provides guidance on this conversion (FTA Table 6-14) and notes that groundborne noise is generally only relevant where vibration sources are high amplitude and low frequency, such as trains, pile drivers, or large vibratory equipment operating in close proximity to sensitive receptors. As also acknowledged by the commenter, traffic is typically not a source of significant groundborne noise. The FSEIR’s analysis is consistent with FTA guidance and confirms that traffic-induced groundborne vibration at the Grace to You Christian Ministry site is low, and that the estimated groundborne noise level of 37 dBA from vibratory rollers would be more than 13 dBA lower than the existing ambient vibration-related noise levels in the area. This supports the conclusion that no perceptible or adverse impact to radio broadcast operations from construction-related groundborne noise would occur and impacts would be less than significant. Furthermore, even under worst-case scenarios involving the use of vibratory rollers at the closest approach distance, vibration levels would not exceed the FTA’s criteria for damage to non-engineered structures or annoyance at sensitive receptors.

Based on the conservative analysis of both vibration and groundborne noise levels, the FSEIR concludes that significant impacts would not occur, and therefore, contrary to the comment, no additional mitigation is required under CEQA.

#### **Wilson Ihrig Comment 3-4**

These comments detail how the use of mufflers is an effective noise control measure for noise reduction. We agree that mufflers are a best practice noise control measure. However, there is no proof in either the DSEIR or the FSEIR that the use of mufflers would reliably reduce noise levels. The Federal Highway Administration (FHWA) Construction Noise Handbook states that optimal mufflers can provide an additional 10 dBA of attenuation; yet there is no evidence that the modeled equipment does not already have optimal mufflers in the noise model. The RCNM model uses noise source data that is 25 years old; the FSEIR provides no proof other than idle speculation that advancements in construction equipment technology have led to quieter machinery.

We agree that requiring mufflers is a best practice measure for construction noise control. However, with respect to demonstrating that noise levels remain below significance thresholds, the FSEIR provides no proof that the source levels used in the analysis can actually be reduced through the use of mufflers.

#### **Additional Information in Response to Wilson Ihrig Comment 3-4**

The FSEIR correctly identifies the use of mufflers, specifically enhanced or optimal mufflers, as a best practice noise control measure consistent with the FHWA Construction Noise Handbook.

The comment asserts that there is “no proof” that the modeled equipment can be further reduced through muffler use, and that RCNM’s source levels are based on data that are approximately 25 years old. However, as discussed in the FSEIR, the FSEIR does not assume baseline (“standard”) mufflers already incorporated in RCNM are the final configuration. Rather, it explicitly assumes installation of optimal mufflers, a mitigation strategy recommended by FHWA, which provides agency guidance that an additional 10 dBA or more attenuation beyond standard mufflers is achieved by optimal mufflers as required by Mitigation Measure ES/VCC-MM-NOI-1. This level of reduction is directly supported by the FHWA Construction Noise Handbook, which lists “engine enclosures/optimal mufflers” as one of the most effective mitigation options and the FHWA, Special Report—Measurement, Prediction, and Mitigation, cited in the Noise Report, Appendix 5.8, for the SEIR.<sup>1</sup> It is appropriate to rely on expert agency guidance, such as from the FHWA, notwithstanding the comment.

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<sup>1</sup> See Final SEIR, Page 2.0-102 (“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.”); Final SEIR, page 2.0-103 (describing how Appendix 5.8, Community Noise Assessment, of the Draft SEIR, page 40, specifies that the 10 dBA

Additionally, while the RCNM's database includes source levels originally developed during the 1990s and 2000s, these values reflect conservative (higher) sound levels from large infrastructure projects like the Boston "Big Dig," which were conducted under standard muffler requirements at that time. As a result, the baseline source levels used in the FSEIR already represent a worst-case scenario compared to today's typically quieter equipment based on newer construction equipment.

By applying noise reductions from enhanced mufflers to RCNM's already conservative source levels, the FSEIR provides a data-supported and industry-recognized estimate of achievable noise reductions, rather than speculation. This approach ensures that the analysis does not underestimate potential construction noise levels and provides a worst-case assessment.

In summary, the FSEIR's mitigation assumptions are consistent with FHWA guidance, reflect worst-case baseline source levels, and explicitly apply enhanced mufflers beyond standard practice, which FHWA confirms yields 10 dBA or more of additional attenuation. As such, the FSEIR provides a reasonable and evidence-based demonstration of the effectiveness of mufflers in reducing construction noise levels and does not rely on "idle speculation."

### **Wilson Ihrig Comment 3-5**

This comment describes our concerns that Mitigation Measures NOI-2, the use of strategic idling locations, and NOI-4, proactive community engagement, would not guarantee the reduction of noise levels. The FSEIR states that no numerical reductions are assumed from these measures, and their inclusion is consistent with best practices in construction noise management. We maintain our original comment that these are not true mitigation measures and would fail to reduce worst case construction noise levels, leaving significant impacts unmitigated. If these measures cannot reduce noise below appropriate thresholds, then the construction noise remains significant and unmitigated.

### **Additional Information in Response to Wilson Ihrig Comment 3-5**

As previously stated in the DSEIR and reiterated in FSEIR, Mitigation Measures ES/VCC-MM-NOI-2 (strategic idling and equipment placement) and ES/VCC-MM-NOI-4 (proactive community engagement) are included as supplemental best practice measures that support overall construction noise management. The FSEIR makes clear that no numerical noise reductions are credited to these measures, and therefore, their inclusion conservatively does not influence the determination of significance under CEQA thresholds.

The assertion that these are "not true mitigation measures" fails to acknowledge that CEQA allows for the incorporation of non-quantitative best practices that reduce the intensity, duration, or

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reduction in construction noise comes from optimal muffler systems); Appendix 5.8, Noise Study, p. 40 ("FHWA, Special Report— Measurement, Prediction, and Mitigation, updated June 2017, [https://www.fhwa.dot.gov/Environment/noise/construction\\_noise/special\\_report/hcn04.cfm](https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm), Accessed December 2021.").

community disruption associated with a significant impact, even if they do not reduce the peak level of noise at a receptor during a worst-case scenario. More specifically, ES/VCC-MM-NOI-2 minimizes prolonged exposure to noise by recommending placement of idling and stationary equipment away from sensitive receptors where feasible. While it does not eliminate construction activity near all receptors, it is designed to reduce average noise exposure over the construction period, consistent with practices endorsed by the FHWA Construction Noise Handbook. Also, ES/VCC-MM-NOI-4 establishes a formal channel of communication with potentially affected community members. This facilitates advanced notice of particularly disruptive activities, allows for scheduling adjustments when feasible, and contributes to overall impact minimization by improving predictability and community tolerance.

Again, the FSEIR's impact determination does not rely on these measures to reduce noise below the significance threshold. Rather, they are identified as reasonable and effective methods to reduce adverse effects to the extent practicable. Their implementation would result in additional benefits to the surrounding community beyond the conservatively modeled noise levels.

In conclusion, the FSEIR already assumes no noise reduction credit from ES/VCC-MM-NOI-2 and ES/VCC-MM-NOI-4, meaning that any actual benefit realized from their implementation would only serve to further construction noise levels. As documented in the Final SEIR, even without quantifying ES/VCC-MM-NOI-2 and ES/VCC-MM-NOI-4, the Final SEIR determines that the Modified Project with mitigation would not result in new significant impacts. The assertion that the impact remains significant due to these measures being "ineffective" is incorrect, because the significance determination already accounts for their non-quantitative nature.

### **Wilson Ihrig Comment 3-6**

This comment details our concerns that how operational noise levels from mechanical HVAC units were not analyzed, as the DSEIR only cites county code requirements that must be met in the future. The response states that the County Building and Safety Department must review all permit applications to ensure that all proposed mechanical equipment complies with applicable noise regulations, and that noise attenuation measures may be required as part of that future submittal.

### **Additional Information in Response to Wilson Ihrig Comment 3-6**

The DSEIR appropriately addresses operational noise from mechanical HVAC units by HVAC systems are regulated by County design standards and review as part of the final design-level details, which includes mandatory compliance with County noise regulations. For example, as described on page 5.8-43 of the Draft SEIR:

As required by existing code, air conditioning equipment within the Entrada South and VCC Planning Areas would be designed to meet applicable requirements set forth in the County Noise Ordinance (Section 12.08.530), which limit noise levels to a maximum of 50 dBA at the

adjacent on-site property. Similarly, mechanical equipment associated with the proposed commercial development within the planning areas would be designed so as not to exceed 45 dBA at the nearest off-site residential property or 55 dBA at the nearest commercial property per the County Noise Ordinance (Section 12.08.390).

At the time of environmental review, specific equipment models, locations, and operational parameters (e.g., tonnage, RPM, shielding, roof orientation) are not yet finalized. Therefore, the analysis properly recognizes that precise HVAC noise calculations to the Building and Safety Department's plan check process, which ensures that any mechanical equipment installed during construction will be reviewed for compliance with all applicable County noise standards. This is consistent with the County's standard CEQA practice for addressing operational HVAC noise impacts, particularly when compliance with objective noise standards is mandatory and enforceable based on adopted County standards and compliance obligations.

Further, the SEIR page 5.8-43, documents that the Modified Project would not increase operational equipment noise levels relative to the 2017 Project, which includes operational noise related to HVAC systems. Therefore, because noise levels would not increase compared to the 2017 Project, the Modified Project would not cause new or substantially more significant impacts from operations. Accordingly, contrary to this comment, the SEIR appropriately analyzed operational noise impacts, included related to noise from HVAC units.

#### **Wilson Ihrig Comment 3-7**

However, the analysis includes no discussion of how realistic noise attenuation could be. Typical noise levels associated with mechanical equipment can be placed in a noise model with distance attenuation and project geometry to determine if there is an impact that would require mitigation. Mechanical noise may also combine with other operational noise levels, such as parking lot noise or loading dock noise, and only analyzing noise at a later date may omit significant impacts resulting from the combination of multiple sources. To confirm a less than significant impact, the Project Applicant should demonstrate that the combined noise levels generated by these sources remain below appropriate significance thresholds.

#### **Additional Information in Response to Wilson Ihrig Comment 3-7**

As detailed in the DSEIR and FSEIR, the analysis does account for potential operational noise from mechanical equipment, parking areas, and loading zones, and concludes that impacts would be less than significant based on compliance with the Los Angeles County Noise Ordinance and the fact that the Modified Project would not increase operational noise equipment compared to the 2017 Project.

As detailed in the DSEIR, all mechanical equipment associated with residential and commercial uses within the Entrada and Valencia Commerce Center Planning Areas will be required to comply with applicable County noise standards. These enforceable noise standards are applied during the

County's Building and Safety plan check process, and compliance is mandatory prior to permit issuance. While precise mechanical equipment specifications are not available at the environmental review stage, the analysis appropriately assumes that compliance will be achieved through typical and feasible measures such as equipment selection, shielding, and placement/setback, all of which are standard industry practice. Therefore, potential noise impacts from HVAC and other mechanical equipment would remain below applicable thresholds, and no significant impact would occur.

The DSEIR further accounts for noise from parking areas, vehicle circulation, door closures, voices, and intermittent alarms, concluding that these sources are adequately separated from off-site sensitive receptors and, in many cases, shielded by intervening structures and topography:

- In the Entrada Planning Area, commercial buildings are a minimum of 1,200 feet from sensitive receptors in the Westridge and Mission Village communities, with parking areas located behind buildings, and shielded by hillsides or structures.
- In the Valencia Commerce Center Planning Area, off-site residences are located at least 600 feet away, with additional shielding provided by buildings closer to the sensitive receptors. Live Oak Elementary School is located over 1,400 feet from proposed development.

Additionally, loading and unloading activities would occur in compliance with the County Noise Ordinance, which restricts operations during nighttime hours (10:00 PM to 6:00 AM), further reducing potential disturbance.

Further, as detailed above, the SEIR page 5.8-43, documents that the Modified Project would not increase operational equipment noise levels relative to the 2017 Project, therefore, no new significant impacts from operations would result for the Modified Project.

In conclusion, the SEIR does not defer operational noise analysis, as suggested by the comment. Rather, it provides a comprehensive evaluation of foreseeable on-site noise sources and demonstrates that mechanical equipment will comply with enforceable County standards and parking and loading noise will be minimized through design and distance. Accordingly, no new or more severe significant noise impacts would result from the Modified Project, and no additional modeling or recirculated analysis is warranted.

### **Wilson Ihrig Comment 3-8**

This comment details our concerns regarding a circular reference in Appendix 5.8 of the DSEIR and explains how Table 12 shows the traffic levels for the project and indicates whether a more thorough noise analysis is required. We maintain that stating 'See Table 12' within Table 12 is confusing and constitutes a circular reference. The analysis should simply state whether there is a traffic increase within the column to the right of the 'further analysis required' column for clarity.

### **Additional Information in Response to Wilson Ihrig Comment 3-8**

The assessment of operational roadway noise starts with a comparison of the average daily traffic (ADT) volumes forecasted to occur under the 2017 Approved Project and the Modified Project, which is provided in **Table 12** of the Noise Study (Appendix 5.8 of the SEIR). If ADT volumes go up under the Modified Project compared to the 2017 Approved Project, there is a potential for an increase in community noise levels attributable to motor vehicle travel under the Modified Project compared to the 2017 Approved Project and additional analysis would be required. On the other hand, if ADT volumes remain the same or go down under the Modified Project compared to the 2017 Approved Project, there would not be an increase in community noise levels attributable to motor vehicle travel under the Modified Project compared to the 2017 Approved Project. The analysis in **Table 12** shows 22 segments out of 35 were identified as “No” to requiring further analysis. Additionally, the analysis also states 13 segments out of 35 were identified as “Yes” to requiring further analysis.

For those roadway segments where ADT volumes increase under the Modified Project (compared to the 2017 Approved Project), and identified as “Yes” to requiring further analysis, detailed modeling of community noise levels has been conducted and provided in **Table 13** and **Table 14**. The results of this modeling were compared to the established significance thresholds to assess the extent of potential impacts under the Modified Project. The results clearly state the overall noise level increases are very small and would not be discernible in the context of the community noise environment.

The commenter points out that Table 12 includes a reference to “Table 12.” The correct cross-reference should be “Table 14.” The commenter made a similar comment on the Draft SEIR (Comment 7-64) and this memo clarifies the response to that comment (Final SEIR, Response to Comment 7-64). Notably, Table 12’s reference to “Table 12” was not necessary to present the data and did not impact the analysis or conclusions in any way. Contrary to the comment, Table 12’s reference to “Table 12” is not confusing because Table 12 clearly presented data related to offsite noise impacts as intended. Further, the results in Table 12 were accurately and appropriately described in the accompanying text of the Noise Study, as summarized above. Subsequent Table 13 and Table 14 further analyzed the data and demonstrated why roadway noise impacts would not exceed applicable thresholds of significance nor result in a discernable noise increase. The SEIR includes a similar analysis based on the data in the Noise Study, concluding that no new impacts would result from the Modified Project related to roadway noise because the data demonstrate that overall noise level increases would not be discernible in the context of the community noise environment (see, e.g., Table 5.8-9 [2030 Roadway Traffic Noise Impacts] of the Draft SEIR and corresponding text on pages 5.8-39 to 5.8-4 presenting the data from the Noise Study and detailing why the Modified Project would not result in new significant impacts compared to the 2017 Project with respect to this topic). The commenter does not raise any concerns with the description of impacts in the Noise Study or the SEIR. Therefore, the reference raised in this comment does not

have any affect on the analysis or conclusions; accordingly, no additional corrections or analysis is needed.

In summary, the analysis in Table 12 of the Noise Study shows 22 segments out of 35 were identified as “No” to requiring further analysis and 13 segments out of 35 were identified as “Yes” to requiring further analysis. For those roadway segments where ADT volumes increase under the Modified Project (compared to the 2017 Approved Project), and identified as “Yes” to requiring further analysis, detailed modeling of community noise levels was conducted and provided in Table 13 and Table 14 of the Noise Study. The results of this modeling were compared to the established significance thresholds to assess the extent of potential impacts under the Modified Project. The results clearly state the overall noise level increases would not be discernible in the context of the community noise environment, as accurately and appropriately described in the Noise Study and SEIR.

#### **Wilson Ihrig Comment 3-9**

We believe that several of our comments are not addressed in the FEIR. As such, we believe this report both underestimates significant impacts from the project and does not study all potential ways to mitigate identified impacts. Feel free to contact us with any questions.

#### **Additional Information in Response to Comment 3-9**

This comment concludes the letter, reiterates the criticism of the FEIR contained in the previous comments. Refer to Response to Comment Nos. 3-1 through 3-8. No additional response is necessary. The SEIR appropriately analyzed noise impacts and demonstrated that, with mitigation, the Modified Project would not result in new or substantially more severe significant impacts.



**Reference: Entrada South and Valencia Commerce Center Transportation Impact Analysis Overview**

development evaluated in the State-certified EIR. As such, the proposed Entrada South and VCC Project is referred to in the TIA as the “Modified Project.”

- The Modified Project results in a total reduction of trips of approximately 19% (i.e., a reduction in approximately 13,000 daily trips) compared to the 2017 Project as analyzed in the State-certified EIR.

***CEQA Analysis (VMT)***

- The Modified Project’s potential impacts related to vehicle miles traveled (VMT) were evaluated in accordance with the County’s updated TIA Guidelines and recommendations from the Governor’s Office of Planning and Research Technical Advisory.
- Screening criteria outlined in the TIA Guidelines state that projects that generate less than 110 net new trips per day are concluded to have a less than significant impact in accordance with OPR’s Technical Advisory. The Modified Project, which is predominately non-retail, would not generate more than 110 trips per day in comparison to the 2017 Project as analyzed in the State-certified EIR. Specifically, the Modified Project would generate approximately 13,000 ADT less than the 2017 Project, which is a 19% reduction in trips. Therefore, the Modified Project would meet the trip generation screening criteria and would not be subject to further VMT analysis.
- While not required, a VMT analysis was prepared for informational purposes, which demonstrated that the Modified Project would have a less-than-significant impact on VMT based on the County’s TIA Guidelines.
- The Project will implement Transportation Demand Management (TDM) measures to reduce vehicle trips.

***Non-CEQA Analysis (LOS)***

- For non-CEQA purposes, the Modified Project’s potential impacts related to level of service (LOS) metrics were evaluated in accordance with the County’s TIA Guidelines. An operational analysis of the roadways and intersections potentially affected by development of the Modified Project was prepared and improvements related to site access were identified.
- A comparison of traffic forecasts for the 2030 horizon year (the Modified Project’s anticipated buildout date) that are based on the 2017 Project from the State-certified EIR and based on the Modified Project, respectively, shows that the Modified Project generally results in lower traffic volume forecasts in comparison to the 2017 Project.
- For the Entrada South planning area, the Project will extend the westbound left turn lane at the Media Center Lane at Magic Mountain Parkway intersection. In addition, certain on-site roadway improvements are required to provide site access and intersection lane configurations and traffic controls recommendations are proposed in the TIA.

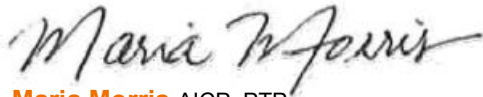
**Reference: Entrada South and Valencia Commerce Center Transportation Impact Analysis Overview**

- For the VCC Planning area, the Project will extend the northbound left turn lane at The Old Road at Turnberry Lane and construct a traffic signal at the intersection. In addition, certain on-site roadway improvements are required to provide site access and intersection lane configurations and traffic controls recommendations are proposed in the TIA.

The Project's draft TIAs were reviewed by the County multiple times, and the final TIA was approved by the County Public Works and Traffic Safety and Mobility Division on June 27, 2024. This memo provides a summary of the TIA and does not change the overall analysis or conclusions with the prior responses to comments. The comments do not raise issues that require changes to the TIA or the analysis in the SEIR.

Sincerely,

**STANTEC CONSULTING SERVICES INC.**



**Maria Morris** AICP, PTP  
Sr. Transportation Planner  
Phone: (949) 923-6072  
Maria.Morris@stantec.com

**Daryl Zerfass** PE, PTP  
Principal, Transportation Planning & Traffic Engineering  
Phone: (949) 923-6058  
Daryl.Zerfass@stantec.com