LA COUNTY PLANNING

AMY J. BODEK, AICP
Director,
Regional Planning

DENNIS SLAVIN
Chief Deputy Director,
Regional Planning

SUPPLEMENTAL REPORT TO THE REGIONAL PLANNING COMMISSION

DATE ISSUED:	January 27, 2026
HEARING DATE:	January 28, 2026 AGENDA ITEM: 7
PROJECT NUMBER:	R2015-00408
PERMIT NUMBERS:	Vesting Tentative Tract Map ("VTTM") No. 073336 (RPPL2023004336) Vesting Tentative Parcel Map ("VTPM") No. 073335 (RPPL2023004448) Conditional Use Permit ("CUP") No. RPPL2023004316 Environmental Assessment No. RPPL2023004887
SUPERVISORIAL DISTRICT:	5
PROJECT LOCATION:	"Northlake Phase 1 Project", located North of Lake Hughes Road, East of Ridge Route Road and I-5, and West of Castaic Lake and Lagoon
OWNER:	Northlake Associates LLC
APPLICANT:	Northlake Associates LLC
CASE PLANNER:	Jodie Sackett, Senior Planner jsackett@planning.lacounty.gov

The purpose of this supplemental report is to provide the Regional Planning Commission ("Commission") with minor revisions and additions to the hearing materials sent out on January 15, 2026. These revisions include a minor correction to the senior housing counts, providing the Findings of Fact/Statement of Overriding Considerations (FOF/SOC), recently received letters and comments from the public, and a second response to public comments provided by the applicant.

PROJECT DESCRIPTION

Northlake Phase 1: Phase 1 of the adopted Northlake Specific Plan ("Northlake Phase 1") comprises a total of 386 lots and 2,295 dwelling units on 720 gross acres; including 288 single-family residential lots; 17 multi-family lots with 1,341 attached condominium dwelling units in 268 buildings (900 ownership, 441 rental); six senior multi-family lots comprising 345 attached condominium dwellings in 68 buildings (209 ownership, 136 rental); three multi-family lots with 174 detached dwelling units in 55 buildings (132 ownership, 98 rental); one mixed-use commercial lot with 46 attached afford-

able dwelling units and 31,200 square feet ("sf") of commercial space in 8 buildings (34 ownership, 12 rental); one live-work commercial lot with six live-work units comprising 7,500 sf of commercial space in 6 buildings (6 ownership, 0 rental); one senior affordable multi-family lot with 95 attached affordable dwelling units in 95 buildings (all ownership); one highway commercial lot (2.5 acres), 39 open space lots, 11 park lots, 13 debris basin lots, two water tank lots, one water quality basin lot, one pump station lot, and one fire station lot (1.4 acre building pad). Of the total 2,295 dwelling units in Northlake Phase 1, 1,777 units are proposed to be for-sale and 518 units anticipated for rental.

REVISED HEARING DOCUMENTS

There is a typographical error on pages four and 13 of the CUP Findings – the breakdown of the affordable senior units is incorrect. The correct breakdown is 95 senior affordable units, not 46. The CUP Findings in question are below with the tracked changes (bold added for emphasis):

> *(Page 4) Northlake Phase 1 proposes a total of 315 affordable attached rental units for Very Low, Lower, and Moderate-Income households, of which 269 shall be affordable rental and* ~~***46***~~ ***95*** *shall be senior affordable rental units.*
>
> *(Page 13) The Commission finds that Northlake Phase 1 is not subject to the IHO. The Northlake SP was adopted in 1992, prior to the effective date of the IHO. The related CUP filed provides a total of 315 rental affordable housing units (269 affordable and* ~~***46***~~ ***95*** *senior-affordable) at the Very Low, Lower, and Moderate household income levels and which are required per the original 2019 Board approval.*

ADDITIONAL CORRESPONDENCE RECEIVED

Additional correspondence has been received since January 22, 2026, and is attached.

Report Reviewed By: _____
Joshua Huntington, AICP, Supervising Regional Planner

Report Approved By: _____
Susan Tae, AICP, Assistant Administrator

Supplemental Attachment A: 17 letters (10 letter opposed and seven letters in support)
Supplemental Attachment B: Draft FOF/SOC
Supplemental Attachment C: Second response to comments (applicant)

Outlook

Support Northlake – Project No. R2015-00408

From Jordin Hopkins <jordin.hopkinss@gmail.com>
Date Thu 1/22/2026 9:13 AM
To Jodie Sackett <jsackett@planning.lacounty.gov>

CAUTION: External Email. Proceed Responsibly.

Dear Mr. Sackett,

As a local resident, I am writing to express my support for the Northlake project.

Our region is facing a serious shortage of affordable and price-attainable housing, and Northlake helps address that need while also delivering significant parks, open space, trails and recreational amenities that will benefit the entire community.

In addition to housing, the project will provide meaningful economic benefits, including support for local businesses, job creation, and long-term investment in transportation and community infrastructure. New homes mean a stronger local economy and a more complete, sustainable community.

Northlake represents thoughtful planning that balances housing, environmental stewardship, and economic opportunity. I respectfully urge the Commission to support this project.

Thank you for your time and consideration.

Sincerely,
Jordin Hopkins

Outlook

Support for Northlake – Project No. R2015-00408

From Jeff <jeff@tgmi.onmicrosoft.com>
Date Thu 1/22/2026 10:52 AM
To Jodie Sackett <jsackett@planning.lacounty.gov>
Cc John Musella (TMG) <john@musellagroup.com>; Jeff <jeff@tgmi.onmicrosoft.com>

CAUTION: External Email. Proceed Responsibly.

My name is Jeff Preach, and I am a long-time resident of Castaic. I am writing to express my strong support for the Northlake project and to share a perspective that many people in our community rarely get the chance to put on the record—the impact that decades of delay have had on local businesses.

For years, retail centers were built in Castaic and businesses chose to locate here with the expectation that the Northlake community would be developed as approved by Los Angeles County in the early 1990s. Those businesses made long-term investments based on that promise. Unfortunately, Northlake never moved forward, and many of those businesses have been waiting—literally for decades—for the customer base that was supposed to arrive.

As a result, Castaic's local retail and service businesses have struggled. We do not have the population density needed to support restaurants, neighborhood services, and small retailers. Some businesses have closed, others barely get by, and new businesses are hesitant to invest. This is not because of a lack of effort or quality—it is because there simply are not enough rooftops.

Castaic badly needs the economic activity that new homes bring. New residents mean customers who shop locally, eat locally, and support local services. That economic impact is critical if we want our community's retail centers to survive and thrive rather than remain underutilized.

Northlake represents a long-overdue opportunity to finally deliver on what was planned and promised. Allowing this project to move forward is not just about housing—it is about keeping local businesses alive and creating a complete, sustainable community.

I respectfully urge the Los Angeles County Regional Planning Commission to support approval of the Northlake project and allow Castaic to finally realize the economic benefits it has been waiting for.

Thank you for your time and consideration.

Respectfully,

Jeff Preach

Castaic, CA
(661)993-7999
jeff.preach@earthlink.net
jeff@tgmi.onmicrosoft.com

Outlook

Support Northlake – Project No. R2015-00408

From Eric Angle <eangle@pmpmanage.com>
Date Thu 1/22/2026 8:58 AM
To Jodie Sackett <jsackett@planning.lacounty.gov>

CAUTION: External Email. Proceed Responsibly.

Dear Mr. Sackett,

As a local resident, I am writing to express my support for the Northlake project.

Our region is facing a serious shortage of affordable and price-attainable housing, and Northlake helps address that need while also delivering significant parks, open space, trails and recreational amenities that will benefit the entire community.

In addition to housing, the project will provide meaningful economic benefits, including support for local businesses, job creation, and long-term investment in transportation and community infrastructure. New homes mean a stronger local economy and a more complete, sustainable community.

Northlake represents thoughtful planning that balances housing, environmental stewardship, and economic opportunity. I respectfully urge the Commission to support this project.

Thank you for your time and consideration.

Sincerely,

PMP MANAGEMENT
Eric Angle - CMCA, AMS, PCAM
Division Vice President
eangle@pmpmanage.com
www.PMPmanage.com
661.295.4900

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January 26, 2026

Planning Commission
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

Comments on Partial Recirculated Final Supplement EIR
NorthLake Project - SCH 2015031080

Dear Planning Commissioners:

The Santa Monica Mountains Conservancy, a trustee CEQA agency, offers the following comments on the Partial Recirculated Final Supplemental Environmental Impact Report (PRFSEIR) for the proposed North Lake project. The PRFSEIR remains inadequate in multiple areas and must again be revised and recirculated. The mass-graded 33 million cubic yard project next to State Park land is an embarrassment to the County's efforts to balance housing development with open space protection. Many options remain for the County to reduce the project impacts without violating any State housing laws and still meet the Project Objectives.

Both the proposed project and the Partial Creek Avoidance Alternative (PCAA) would irreparably and significantly degrade regional wildlife population connectivity across Interstate 5 by virtually blocking all access to a key, large box culvert under the adjacent southbound lanes of Interstate 5. Since the Court ruling on this project, in concert, Caltrans and the California Department of Fish and Wildlife have designated the subject section of Interstate 5 as a Priority Barrier to Statewide wildlife movement. The EIR-shown routes of how wildlife could reach this culvert from the project are a scientific fantasy forcing wildlife to travel a quarter mile on traffic noise and headlight saturated slopes, including Caltrans rights-of-ways, between the freeway and Ridge Route Road before crossing into habitat free of busy roads.

If the County insists on approving a project with this avoidable, regionally significant biological impact, the PCAA is far better for all other environmental impacts and the public welfare; and being the feasible Environmentally Superior Alternative should be the approved project. The upper half of Grasshopper Canyon would not need to be filled in with 10 million cubic yards of fill pulled from ridgelines.

However, with the PCAA footprint remaining intact, a relatively minor adjustment to the northern project access road can avoid this regionally significant biological impact. That access road can be moved to the south such that wildlife crossing Ridge Route Road to and

from the box culvert would no longer have to navigate through a signalized, street lit intersection, a four-lane road, and a 100-foot-tall, manufactured slope with concrete v-ditches. The attached figure shows the problem with the existing access road location and where that new road alignment should go. This adjustment will add some grading and expense, but the Interstate 5 box culvert cannot be moved.

It is disturbing that both this proposed northern access road, commercial pads, and manufactured slopes for pads occur on Los Angeles County fee simple property. Private land use is proposed on public property (see attached figure). How is the County compensated? In addition, the grading for the access road as shown would put Mountains Recreation and Conservation Authority (MRCA) property (APN 3247-017-906) into a manufactured slope with no MRCA permission.

A key deficiency of the CEQA environmental analysis to date is the failure to first analyze and disclose the rarity and regional ecological importance of the large box culvert under the adjacent southbound lanes of Interstate 5 to allow inter-mountain range wildlife movement. The second failure is for both the proposed project and the Partial Creek Avoidance Alternative (PCAA) to adequately avoid eliminating the habitat directly across Ridge Route Road that all wildlife species need to access the wildlife tunnel with enough regularity. The callousness and inadequacy of the analysis to date is reflected in the concluding PRDSEIR paragraph:

> *The cumulative impact on biological resources would be considered greater than the Project alone. However, when considering all the proposed and existing projects in the Project area, the previously approved Project contributes a relatively small portion of the impacts in the area due to its relatively small impact acreage, and the location adjacent to existing development. The Project is not expected to contribute a significant impact to the Project area. Incremental impacts would not be cumulatively considerable, and no additional mitigation is required.*

The CEQA environmental analysis to date makes a mockery of the ecological importance of the project property and Grasshopper Canyon. A key example is that the analysis says it is just possible that mountain lions could occur in the area. That analysis omits the fact that mountain lions use and/or occupy any connected habitat in Southern California including fingers of habitat that protrude into residential and commercial areas. Without any scientific question by any expert, all the project area is prime mountain lion habitat.

The Mountains Recreation and Conservation Authority's (MRCA) 2020 photo capture of a State-listed mountain lion using the large box culvert adjacent to the project site is new substantial evidence supporting the importance of the North Lake property to maintain wildlife movement between the mountain ranges bisected by the freeway. Since 2020 the MRCA has also photographed bobcats, mule deer, coyotes, and long-tailed weasels using this undercrossing.

The MRCA is overseeing a State-funded multi-year study of all the existing and potential wildlife crossings of Interstate 5 between Highways 126 and 138 which includes the subject project site and subject tunnel under Interstate 5. Another ongoing study has documented a lion roadkill and collared lion presence between the proposed development footprint and Interstate 5. That second study also documents extensive radio collared mountain lion movement approximately a mile north of the project site in the same large habitat block which is uninterrupted by a paved or public road. This is substantial new evidence that is growing by the month. It will be submitted into the public project record by other entities prior to the January 28, 2026 Planning Commission hearing.

If a project with 33 million cubic yards of grading that extends development over three miles into core National Forest and State Park adjacent habitat is not cumulatively significant given the breakneck pace of the urban transformation of the Santa Clarita Valley, then what project could possibly be so? It is an avoidable tragedy to wildlands and the viewsheds of many public viewing areas.

The Conservancy urges the County not to certify the PRFSEIR. If the County does certify the PRFSEIR, the Conservancy urges that only the Partial Creek Avoidance Alternative be considered for adoption as the environmentally superior alternative. The County should balance new housing in the Specific Plan area with the needs of the existing greater public such as--traffic reduction, open space, wildfire prevention, viewshed protection, air pollution avoidance, water supply, landfills, and access to quality nature.

The best and completely weak argument in the PRFSEIR against the PCAA is that there would 37 less acres of active recreational area. What short sighted thinking. Instead there actually would be hundreds of more acres of usable natural open space, less onsite residents, and any lost recreational area could simply be integrated into the development footprint of the PCAA. The upper half of Grasshopper Canyon would not need to be filled in with 10 million cubic yards of fill.

New substantial evidence to add to the record is the blow out of a high-pressure gas line at the end of 2025 within a few hundred feet of the proposed project. Human proximity to such a blow out could cause multiple deaths and injury. The EIR to date has failed to address the public safety hazard of adding more development and road traffic next to this fragile high pressure gas line. It has also failed to address the safety hazards of potential similar blow outs of the multiple fragile gas lines that must be relocated on the eastern project boundary as part of the proposed project and the PCAA.

The PRDSEIR shows land in Marple Canyon owned by the Mountains Recreation and Conservation Authority (MRCA) as potential mitigation areas. The MRCA has not provided any approval or made any arrangement with the applicant. Most likely that Marple

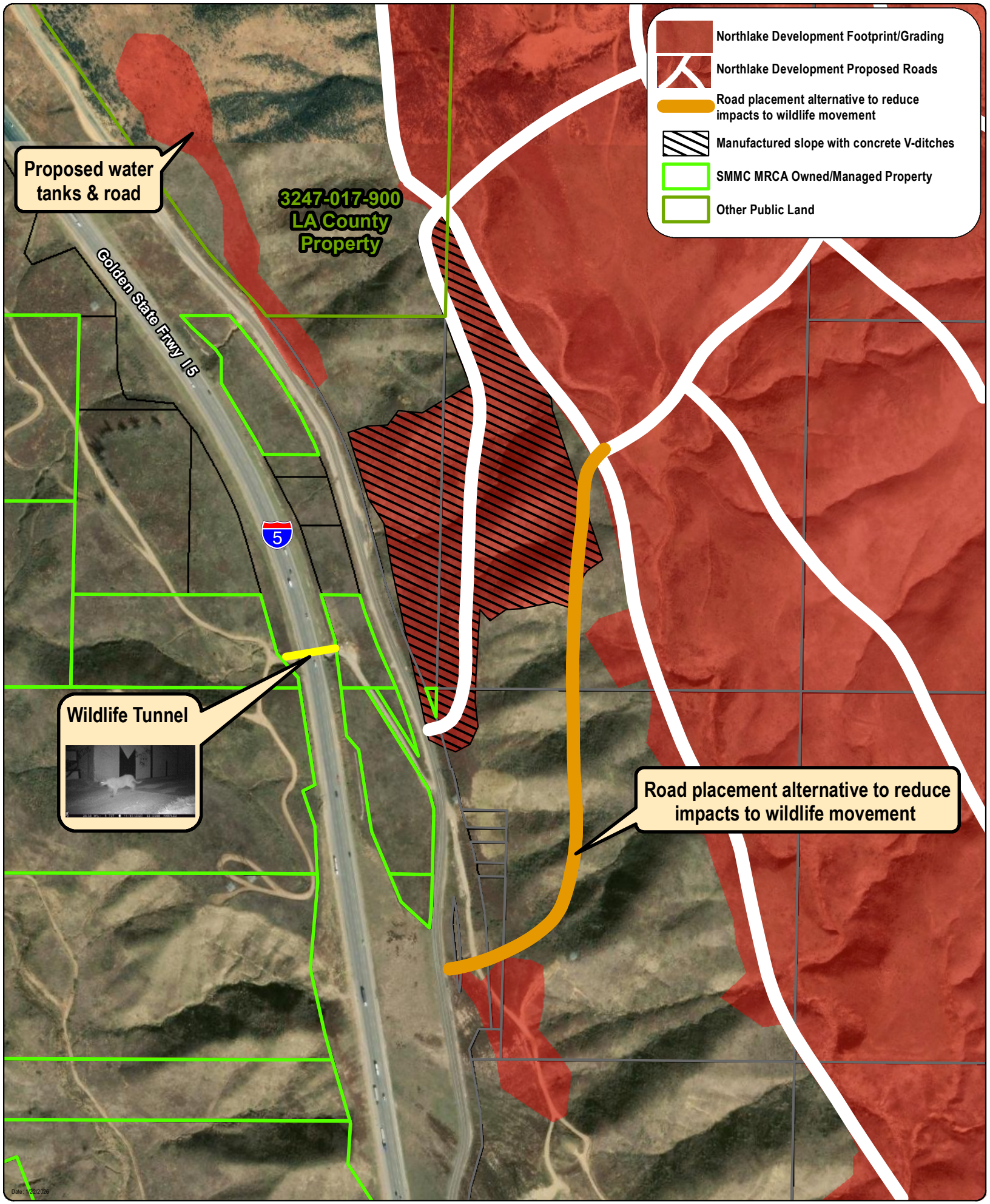
Canyon property is the only feasible location to conduct Spiny Rush mitigation. The EIR is inadequate because most likely no Spiny Rush mitigation area will be available for the project.

Please address any correspondence to Paul Edelman, Deputy Director for Natural Resources and Planning at edelman@smmc.ca.gov or at the above letterhead address.

Sincerely,

Original Signed by

MIGUEL LUNA
Chairperson



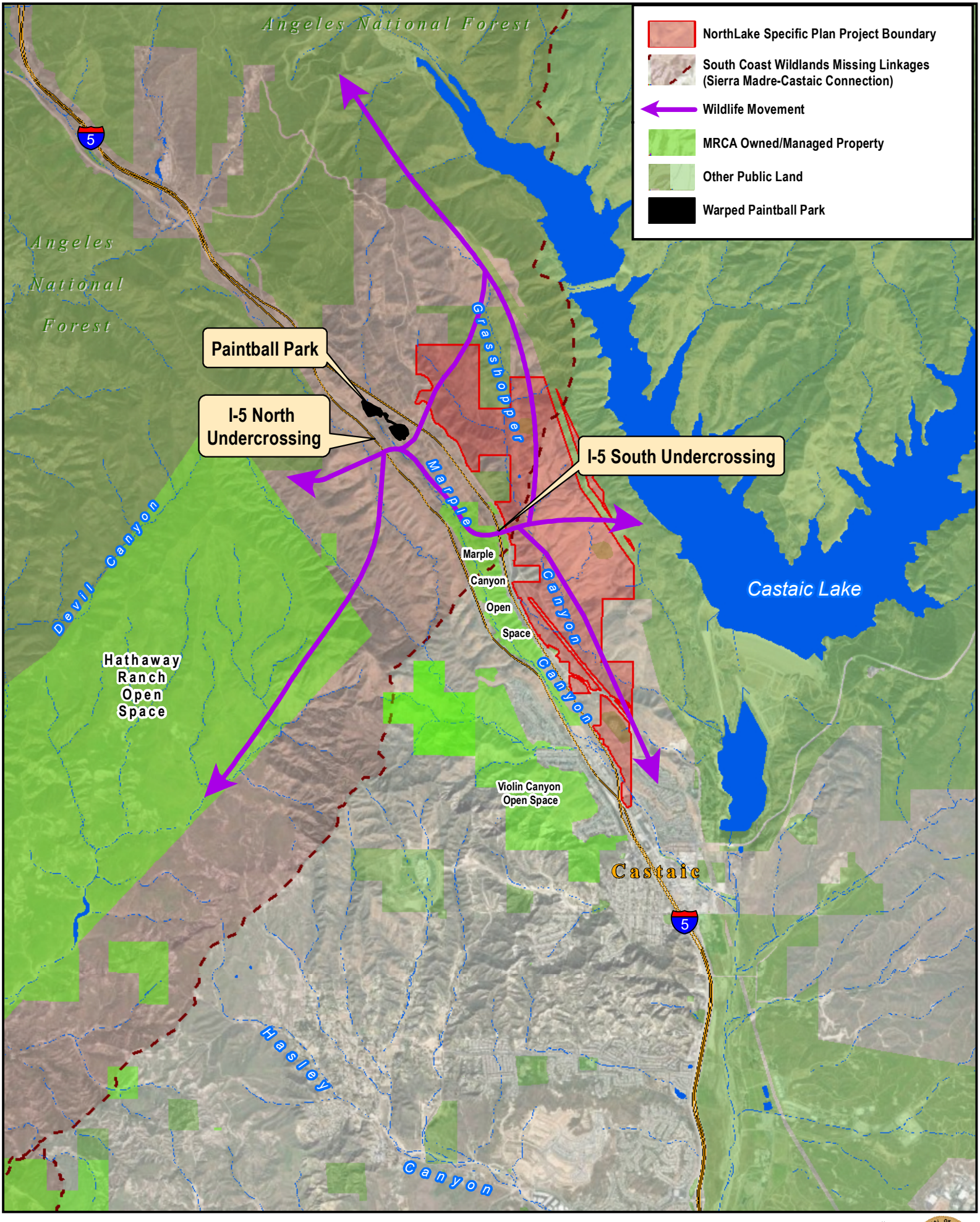
NorthLake Specific Plan

Road Alignment Alternative

N W E S

0 250 500 Feet

RANCHO SIMI RECREATION AND PARK DISTRICT


NorthLake Specific Plan Project Boundary
South Coast Wildlands Missing Linkages (Sierra Madre-Castaic Connection)
Wildlife Movement
MRCA Owned/Managed Property
Other Public Land
Warped Paintball Park
Angeles National Forest
Angeles National Forest
Paintball Park
I-5 North Undercrossing
I-5 South Undercrossing
Grasshopper
Marple
Canyon
Devil Canyon
Hathaway Ranch Open Space
Marple Canyon Open Space
Canyon
Castaic Lake
Violin Canyon Open Space
Castaic
Hasley Canyon
5
5
Miles
0 0.25 0.5

January 27th, 2026

Agenda# 26-013 #7
LA County Regional Planning Commission
320 W. Temple Street, Room 150
Los Angeles, CA 90012

In 1909, California was on the cutting edge of the Good Roads movement. $18 million of state bonds were passed to construct the revolutionary new highway system. Stagecoach roads would soon be a thing of the past and the automobile would take center stage.

When they set out to build the Ridge Route, they were entering uncharted territory. Built by a railroad contractor who believed in the future of the automobile, paved later by WW1 veterans with experimental road surfaces and designed with the purpose of uniting a rapidly splitting California. This road changed the course of history and eventually, its successor, the I-5, would become one of the most important trade routes in the country.

We say this to inform you that the Ridge Route isn't just another winding road. It has been a core part of our community since its opening in 1915 and a key part of our local history. Something worth honoring and protecting. While we understand that progress is inevitable, our organization exists to preserve what we can and document and recover what we can't.

The proposed expansion of the Northlake Development will impact the Ridge Route, realigning 1.5 miles of the road and developing alongside nearly 4 miles of this historic corridor. Along the western border of the project site, hidden off to the edges of the road are C Blocks. Concrete markers placed by the California Highway Commission during the surveying and construction of the road (1913-1915) to mark the original right-of-way. The project site also covers the historic locations of "Queen Nell's Castle" - the homestead of Cornelia "Nellie" Martinez Callahan, and the Owl Garage. Both locations are no longer standing but could have artifacts such as bottles, plates and old car parts. Our organization would like to work with your archaeologists to ensure these markers and artifacts are collected and protected.

Of concern for the future, we worry about the impact of relying on one road to be the only exit for an entire community. The Ridge Route is no stranger to fires and the area was referred to as a "historic fire corridor" in the Northlake Environmental Impact Report. Fires reported at Templin Highway and the I-5 are ever prevalent. The project site burned in the 2022 Route Fire and was under evacuation as recently as the 2025 Hughes Fire. With the widening of the road to 4 lanes, there would now be two southbound lanes and one northbound lane available for evacuation and potentially only for 30 minutes in the case of the "Freeway Spot Scenario" (Northlake EIR).

It is out of concern for the future residents that we suggest looking into creating a secondary southern exit route for the community. Not only for evacuations, but to alleviate traffic on Ridge Route Road, which often functions as a bypass for the I-5 when there is an accident north of Castaic. Allowing residents to come and go unaffected by the freeway conditions.

The Ridge Route Preservation Organization hopes to work with your archaeologist to preserve and honor our local history and encourage your developer to take measures to ensure the safety of future residents. Thank you for your time and consideration.

Sydney Croasmun
Ridge Route Preservation Organization
SCroasmun@ridgeroute.org
P.O. Box 803191
Santa Clarita, CA 91380

Jodie Sackett, Senior Planner, North County
County of Los Angeles Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

January 27, 2026

Re: Project No. R2015-00408-(5) (Northlake Specific Plan)
a. Vesting Tentative Tract Map No. 073336 (RPPL2023004336)
b. Vesting Tentative Parcel Map No. 073335 (RPPL2023004448)
c. Conditional Use Permit No. No. (RPPL2023004316)
d. Environmental Assessment No. (RPPL2023004887)

Dear Mr. Sackett & Planning Commissioners,

In light of the ongoing investigation of the SoCalGas high pressure pipeline rupture of Saturday, December 27, 2025 that occurred within the boundaries of the Northlake Specific Plan, the Castaic Area Town Council is requesting a postponement of consideration for approval of this project.

Our community was very lucky that the rupture happened in an area that has not yet been developed (but is slated for homes as part of the specific plan).

We are requesting that the developer and the county identify the location of the SoCalGas transmission pipeline near or within the Northlake development and the location any other pipelines (oil, gas, or other hazardous liquids) near or within the Northlake boundaries. And that a site-specific gas transmission (and any other hazardous liquids) hazard and consequence analysis be prepared with safety revisions circulated for review.

We are also requesting that the Condition Use Permit for the proposed onsite and offsite cut and fill of 34.32 million cubic yards be presented to our town council for review.

Regards

Bob Lewis

Bob Lewis
President
Castaic Area Town Council

cc: Stephanie English - Senior Field Deputy for Supervisor Kathryn Barger

Jodie Sackett

From: Barbara Myler <Barbara@SummitWestPR.com>
Sent: Thursday, January 22, 2026 12:42 PM
To: Jodie Sackett
Subject: SUPPORT Northlake – Project No. R2015-00408

Importance: High

SUPPORT Northlake – Project No. R2015-00408

Dear Mr. Sackett,

As a local resident, I am writing to express my support for the Northlake project.

Our region is facing a serious shortage of affordable and price-attainable housing, and Northlake helps address that need while also delivering significant parks, open space, trails and recreational amenities that will benefit the entire community.

In addition to housing, the project will provide meaningful economic benefits, including support for local businesses, job creation, and long-term investment in transportation and community infrastructure. New homes mean a stronger local economy and a more complete, sustainable community.

Northlake represents thoughtful planning that balances housing, environmental stewardship, and economic opportunity. I respectfully urge the Commission to support this project.

Thank you for your time and consideration.

Sincerely,

Barbara C. Myler
President/CEO
Summit West Public Relations & Marketing
Valencia Jazz & Blues Concert Series
P.O. Box 55133
Valencia, CA 91385
cell: 661.373.8700
email: Barbara@SummitWestPR.com

SUMMIT WEST PUBLIC RELATIONS & MARKETING

Jodie Sackett

From: Phyllis Grekin <rebyphyllis@gmail.com>
Sent: Friday, January 23, 2026 2:51 PM
To: Jodie Sackett
Subject: Support Northlake

Dear Mr. Sackett,

As a local resident, I am writing to express my support for the Northlake project.

Our region is facing a serious shortage of affordable and price-attainable housing, and Northlake helps address that need while also delivering significant parks, open space, trails and recreational amenities that will benefit the entire community.

In addition to housing, the project will provide meaningful economic benefits, including support for local businesses, job creation, and long-term investment in transportation and community infrastructure. New homes mean a stronger local economy and a more complete, sustainable community.

Northlake represents thoughtful planning that balances housing, environmental stewardship, and economic opportunity. I respectfully urge the Commission to support this project.

Thank you for your time and consideration.

Sincerely,

Phyllis Grekin

Phyllis Grekin DRE #00714238
Realty Executives Valencia
SRAR SCV Council Member 2019
SRAR Member of the Year 2008
24106 Lyons Avenue
Newhall 91321
661-714-3336

Jodie Sackett

From: DRP Public Comment
Sent: Tuesday, January 27, 2026 11:49 AM
To: Jodie Sackett; Joshua Huntington
Cc: DRP Public Comment
Subject: FW: Agenda item 26-013

Please see below public comment for tomorrow's item. Thank you.

ELIDA LUNA (she/her/hers) COMMISSION SECRETARY, Operations & Major Projects (OMP)
Direct: (213) 974-6409
Email: eluna@planning.lacounty.gov

-----Original Message-----
From: Heather Smokler <hsmokler@gmail.com>
Sent: Tuesday, January 27, 2026 11:39 AM
Cc: DRP Public Comment <comment@planning.lacounty.gov>
Subject: Agenda item 26-013

CAUTION: External Email. Proceed Responsibly.

Agenda item 26-013
Agenda #7
Not the Applicant

Heather Smokler
Hsmokler@gmail.com
310-666-0182

Hi

I am writing express my statement against the Northlake Development Expansion. I am a resident at 28628 Cloverleaf Pl and Castaic is my home. As a resident I do not support this development. Not only is Castaic ill equipped to handle that many new residents but I fear the construction will be heavily disruptive to the community. Castaic is such a peaceful haven away from Santa Clarita. I would hate to see it ruined by traffic, noise and overcrowding. I sincerely hope you will consider the needs of the residents here as it would be a shame to drive the current residents out and ruin our peaceful home. I hope you will take this into consideration.

Sincerely,

Heather Smokler

Jodie Sackett

From: DRP Public Comment
Sent: Tuesday, January 27, 2026 11:49 AM
To: Jodie Sackett; Joshua Huntington
Cc: DRP Public Comment
Subject: FW: Northlake development

Please see below public comment Re tomorrow's item. Thank you.

ELIDA LUNA (she/her/hers)
COMMISSION SECRETARY, Operations & Major Projects (OMP)
Direct: (213) 974-6409
Email: eluna@planning.lacounty.gov

From: NationsBest <nationsbestrs@gmail.com>
Sent: Tuesday, January 27, 2026 11:45 AM
To: DRP Public Comment <comment@planning.lacounty.gov>
Subject: Northlake development

CAUTION: External Email. Proceed Responsibly.

Tony Burke,
Nationsbestrs@gmail.com

661-714-4390

Hi,

I'm a homeowner in Castaic and I vehemently oppose this project. I have lived here for 30 years and what makes this area desirable is the peace and small population. The loud construction, the influx of people I'm sure will drive current residents out. Castaic is a haven away from the bustle of Santa Clarita, that's part of what makes it so desirable to live here. This project will not only disrupt that but could lead to a mass exodus of people living here. I hope you will take this into consideration as you make your choice.

Tony Burke
Thank you

Tony Burke
Owner
Retractions Retractable Screen Systems

Retractablescreensonline.com
661-714-4390

800 915 2448
RetractableScreensOnline.com

NationsBestRS@gmail.com

Jodie Sackett

From: DRP Public Comment
Sent: Tuesday, January 27, 2026 11:50 AM
To: Jodie Sackett; Joshua Huntington
Cc: DRP Public Comment
Subject: FW: Agenda item 26-013

Please see below public comment regarding tomorrow's item.

Thank you.

ELIDA LUNA (she/her/hers)
COMMISSION SECRETARY, Operations & Major Projects (OMP)
Direct: (213) 974-6409
Email: eluna@planning.lacounty.gov

From: NationsBest <nationsbestrs@gmail.com>
Sent: Tuesday, January 27, 2026 11:48 AM
To: DRP Public Comment <comment@planning.lacounty.gov>
Subject: Agenda item 26-013

Tony Burke,
Nationsbestrs@gmail.com

661-714-4390

Tony Burke,
Nationsbestrs@gmail.com

661-714-4390

Hi,

I'm a homeowner in Castaic and I vehemently oppose this project. I have lived here for 30 years and what makes this area desirable is the peace and small population. The loud construction, the influx of people I'm sure will drive current residents out. Castaic is a haven away from the bustle of Santa Clarita, that's part of what makes it so desirable to live here. This project will not only disrupt that but could lead to a mass exodus of people living here. I hope you will take this into consideration as you make your choice.

Tony Burke

Tony Burke

Tony Burke
Owner
Retractions Retractable Screen Systems

Retractablescreensonline.com
661-714-4390

800 915 2448
RetractableScreensOnline.com

NationsBestRS@gmail.com

MOUNTAINS RECREATION & CONSERVATION AUTHORITY
King Gillette Ranch
26800 Mulholland Highway
Calabasas, California 91302
PHONE (818) 878-0886

January 26, 2026

Planning Commission
Los Angeles County Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

Recirculated Partial Final Supplemental Environmental Impact Report for the Northlake Phase 1 Project No. R2015-00408, etc., Not in Compliance with CEQA

Dear Planning Commissioners:

The Mountains Recreation and Conservation Authority (MRCA) recommends the Los Angeles County Planning Commission (Commission) find that the Recirculated Partial Final Supplemental Environmental Impact Report (RPFS-EIR) for Northlake Phase 1 Project No. R2015-00408, Vesting Tentative Tract Map No. 073336, Vesting Tentative Parcel Map No. 073335, and Conditional Use Permit No. RPPL2023004316 (Project) is not in compliance with the California Environmental Quality Act (CEQA) and deny the Project as presented to the Commission.

The supplemental findings of fact in the RPFS-EIR are unequivocally incorrect and inconsistent with Public Resources Code Sections 21081 and State CEQA Guidelines Section 15091 as the proposed Project requires compensatory mitigation to be performed on MRCA lands without consultation of, agreement with, or approval by the MRCA. Specifically, the RPFS-EIR identified southwestern spiny rush (*Juncus acutus*) occurrences on MRCA-owned lands to satisfactorily mitigate adverse impacts to documented southwestern spiny rush within the Project (see RPFS-EIR Mitigation Measure [MM] 5.2-5c). On October 5, 2022, the MRCA Governing Board approved MRCA Resolution No. 22-138 entering into a Mitigation Agreement pursuant to California Department of Fish and Wildlife (CDFW) Streambed Alteration Agreement 1600-2015-0271-R5 (and other regulatory permits) with Lennar Homes of California, LLC, to perform habitat mitigation on MRCA property in Marple Canyon associated with the Habitat Mitigation and Monitoring Plan for the Aidlin Hills Residential Project. MRCA has initiated this habitat restoration work in Marple Canyon and cannot provide the requisite off-site southwestern spiny rush compensatory mitigation as outlined in RPFS-EIR MM 5.2-5c.

Further, the proposed Partial Creek Avoidance Alternative (PCAA) would irreparably impact wildlife usage of an oversized box culvert below southbound Interstate 5 (I-5) on MRCA-owned land that provides protected wildlife crossing of I-5 between Marple and Grasshopper Canyons. Deterrence of wildlife use of this protected I-5 crossing in the regionally significant, multi-agency designed *Sierra Madre-Castaic Connection* linking the Southern California Ecoregion with the Tehachapi and Sierra Nevada ranges would result in additional wildlife-vehicle collisions on I-5 and Ridge Route Road and further reduce

the genetic viability of Central Coast and Southern California mountain lion (*Puma concolor*)—a candidate species for protection by California Endangered Species Act (CESA). Given the public trust doctrine codified by Fish and Game Code Section 1600 that wildlife (and their habitat) are held in trust for the people and the protection and conservation of fish and wildlife is of utmost public interest, the Commission has an opportunity to appropriately deny the Project while satisfying the requisite conditions of the Housing Accountability Act (HAA) whereby the Project has (1) specific, adverse impacts upon public health or safety and (2) no feasible method to satisfactorily mitigate or avoid these impacts as related to southwestern spiny rush and mountain lion.

Recent wildfires in the immediate vicinity of the Project include: Holser Fire (2020), Castaic Fire (2020), Route Fire (2021), Route Fire (2022), Hughes Fire (2025), and Canyon Fire (2025). See attached MRCA – Northlake 20-Year Fire Recurrence Map for reference. Repeat fires in the same area over a short interval often result in habitat type change where former oak woodlands are converted to chaparral shrublands and chaparral shrublands are converted to grasslands—each successive type change results in more fire prone, faster burning fuel types. Because the proposed Project's development is sited over one mile from the nearest planned residential developments along Pine Crest Place, the Project unnecessarily fragments habitat and creates a fire-vulnerable island of development surrounded by flashy fuels.

The Project's "planned" expansion of the wildland-urban interface in a California Department of Forestry and Fire Protection (CalFire) designated Very High Fire Hazard Severity Zone (VHFHSZ) endangers the public health and safety of future residents and overburdens local and mutual-aid fire departments tasked to defend ever expanding suburban sprawl. Additionally, the Project Area regularly receives high wind warnings issued by the National Weather Service to alert the public about dangerous weather conditions. As evidenced by the Palisades and Eaton Fires (2025), high wind events and wildfires can overwhelm home-hardening defenses and on-the-ground fire suppression, prevent aerial fire containment, and result in extensive destruction to life and property.

Given the extensive liabilities the County is experiencing from the Palisades and Eaton Fires (2025), the Commission should not further imperil the public, first responders, or the County's fiscal solvency by approving 2,295 new residential units in a VHFHSZ with at least one decaying 34-inch, 600-psi petroleum pipeline running through failure-prone hillsides. The Commission should also recognize the unmitigated threat the Project poses to habitat (including southwestern spiny rush) and habitat connectivity that supports the persistence of State-protected mountain lions in Southern California.

The County must also ensure the Project applicants, developers, financiers, future residents, and insurance providers sufficiently understand the multitude risks of living next to a 34-inch, 600-pounds-per-square-inch pressured petroleum pipeline that ruptured on December 27, 2025, and forced thousands of area residents and visitors to shelter in place. Preliminary investigation indicates the gas pipeline exploded after a minor landslide below Ridge Route Road, on or near LA County APN 3244-014-050 owned by Northlake

Associates LLC, and approximately 250 feet from the primary ingress/egress for the Project. See attached MRCA – Northlake Gas Line Rupture Map for reference. Since there are other aging pipelines that run through the PCAA footprint, the Project's evaluation of hazards must include assessments of each petroleum pipeline, the adequacy of performed pipeline maintenance, and the planned future pipeline maintenance and/or replacement schedule(s) in the Project Area. The Project applicant must also prepare public outreach materials for all future residents (fee owners and renters) outlining emergency preparedness information about how to minimize sensitive-receptor exposure to any future gas line ruptures. Similar sensitive-receptor information should be prepared for future residents for information regarding the nearby Chiquita Canyon Landfill that is unable to abate toxic air pollution derived from uncontrolled decomposition of landfill waste. Commercial businesses within the Project must be required to publicly and prominently display emergency evacuation routes and effective methods to shelter in place.

In 2025, MRCA completed a Wildlife Conservation Board (WCB) funded implementation project to improve 2.5 acres of cover and forage for wildlife at the above-mentioned box culvert I-5 crossing on MRCA land. Throughout the course of this state-funded project that initiated in April 2020, MRCA's wildlife cameras documented several species using the I-5 culvert including: lion, deer, bobcat, coyote, roadrunner, quail, and weasel. Attached are select photos (see MRCA Marple Canyon Photo Exhibit) that document wildlife that will be directly impacted by Project construction and prevented from using this critical connectivity point across the 26-mile-plus I-5 wildlife barrier from State Route 138 (SR 138) to State Route 126 (SR 126) as identified on the Project's PCAA Exhibit 2 map. The same PCAA Exhibit 2 map also delineates presumed wildlife dispersal routes through the Project where wildlife will have to cross a new, at-grade, 64-foot-wide "Modified Industrial Collector" and several crossings of new, at-grade, 40-foot-wide "Local Collector" streets to travel between Grasshopper Canyon and Marple Canyon.

Grasshopper Canyon is currently undeveloped except for overhead and underground utilities and unpaved roads to service these utilities—virtually no barriers to wildlife movement. By developing Grasshopper Canyon, even with the reduced grading footprint for the PCAA, wildlife will be irreparably harmed by the Project's impacts to existing wildlife dispersal routes and forced to cross new Project roads that do not incorporate any avoidance or mitigation measures (such as oversized culverts or bridge spans, habitat cover to reduce vehicle noise and light impacts, etc.) that can facilitate east-west wildlife movement through the Project. The proposed "emergency vehicle access" road to the new school site will connect to Ridge Route Road within 450 feet of the I-5 crossing structure on MRCA property. At minimum, this school service road must be realigned to the south, as shown on MRCA – Northlake Road Alignment Alternative Map, to avoid and/or mitigate additional impacts to this existing I-5 wildlife crossing route of regional significance.

The proposed PCAA school service road's connection with Ridge Route Road is dangerously close (within 200 feet and on a slight curve) to the Marple Canyon access

road used by MRCA, Southern California Edison, SoCalGas Company, and contractors to enter and exit Marple Canyon. The gate at this location is a double-arm swinging gate and there is minimal room for parking along Ridge Route Road to unlock or close the gate. As designed, the school's service road will endanger authorized work crews and the public traveling Ridge Route Road. At minimum, the school service road should be moved to approximate the orientation shown in MRCA – Northlake Road Alignment Alternative Map; however, MRCA recommends a formal traffic study to align with appropriate site distances and intersection design criteria set forth in the California Highway Design Manual as Ridge Route Road is often used as a bypass for I-5 during extreme traffic conditions.

In furtherance of the multi-agency designed *Sierra Madre-Castaic Connection* to identify the least-cost corridor for movement of priority indicator species between the Tehachapi Range and the Transverse Ranges of Southern California, MRCA is conducting a project in coordination with California Department of Transportation (Caltrans), CDFW, U.S. Geological Survey (USGS), and other partner organizations, to study the 26-mile stretch of Interstate 5 (I-5) between SR 138 and SR 126 for wildlife permeability and opportunities to improve wildlife connectivity across I-5. CDFW and Caltrans have each designated this section of I-5 as a barrier to wildlife movement and genetic contact between increasingly homogenous Southern California species with their more heterogenous populations of the Tehachapi and Sierra Nevada mountain ranges.

Preliminary MRCA I-5 study data indicates the oversized box culvert on MRCA property below the southbound I-5 regularly transmits priority megafauna between Marple and Grasshopper Canyons. Complementary mountain lion field work is being collected by U.C. Davis's California Carnivores Program in coordination with U.S. Forest Service to determine how regional lions are, or are not, able to cross I-5. The U.C. Davis project has only recently collared a mountain lion west of I-5 near the Project Area; however, the extent of tracked mountain lion movement data, compared to mountain lion roadkill data, indicates that lions confined east of I-5 and south of SR 138 have limited points of access westerly across I-5 and any further reductions in wildlife connectivity across I-5 associated with the proposed Project will represent cumulative, avoidable impacts to a CESA-protected species. See MRCA – Northlake Puma Observation Map for reference.

Adding additional vehicle traffic to Ridge Route Road to serve the Project's 2,295 new residential units will reduce wildlife approaches to the CDFW and Caltrans recognized I-5 barrier and force wildlife to attempt dangerous at-grade crossings or attempt to use the northern Marple Canyon box culvert identified on PCAA Exhibit 2 that leads directly to an existing paintball/airsoft park that severely dissuades wildlife connectivity. Extensive roadkill data compiled for MRCA's I-5 wildlife connectivity study indicates Project development of Grasshopper Canyon will result in addition roadkill of priority megafauna species including mountain lion, mule deer, black bear, bobcat, coyote, and fox. Increased wildlife-vehicle collisions resultant from the Project will similarly endanger vehicle occupants, increase insurance costs, and increase commerce delays on an already congested I-5.

Through a series of acquisitions facilitated by the Trust for Public Land, in 2022 MRCA completed the 6,000-acre-plus Temescal-Hathaway Ranch acquisition that comprises the bulk of the County-designated Santa Felicia Significant Ecological Area (SEA). Project development would impact wildlife connectivity between Castaic Lake and the Santa Felicia SEA that abuts Ventura County and Lake Piru. Development of 2,295 residential units and associated roadway improvements would irreparably harm wildlife connectivity in this biologically unique and sensitive area between perennial water sources of Lake Piru and Castaic Lake. While Southern California is not currently experiencing drought conditions, climate change science anticipates future droughts punctuated by extreme rainfall events which requires conservation of existing surface water resources and preservation of access to surface water in support of rare, threatened, endangered, or at-risk wildlife.

Considering the threat to public health and safety posed by this Project and the inability of Project applicant to propose mitigation that satisfactorily avoids or mitigates impacts to wildlife and habitat, the Commission is fully justified to deny Project No. R2015-00408, Vesting Tentative Tract Map No. 073336, Vesting Tentative Parcel Map No. 073335, and Conditional Use Permit No. RPPL2023004316.

Please address any correspondence to me by email at chad.christensen@mrca.ca.gov, by phone at (310) 589-3230, ext. 121, or at the above letterhead address.

Sincerely,

Chad Christensen
Deputy Chief
Natural Resources and Planning

Attachments:
MRCA – Northlake Road Alignment Alternative Map
MRCA – Northlake Gas Line Rupture Map
MRCA – Northlake 20-Year Fire Recurrence Map
MRCA – Northlake Puma Observation Map
MRCA – Marple Canyon Photo Exhibit

January 26, 2026

Sent via email, with references via FTP and FedEx

Chair Michael R. Hastings and Members of the
Regional Planning Commission
Los Angeles County Department of Regional Planning
320 West Temple St.
Los Angeles, CA 90012
commission@planning.lacounty.gov
comment@planning.lacounty.gov

Re: January 28, 2026 Regional Planning Commission Meeting Agenda Item No. 7 – Northlake Development (Project No. R2015-00408-(5))

Dear Chair Hastings and Members of the Regional Planning Commission:

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the proposed Northlake Development ("Project"). The Center has reviewed the Recirculated Partial Final Supplemental EIR ("EIR") closely and remains concerned that the EIR's analysis of, *inter alia*, biological resources, wildfire, and transportation impacts is inadequate. The Center urges the Regional Planning Commission ("Commission") not to approve the Project without first remedying these deficiencies.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles County.

I. The RPFSEIR Fails to Adequately Assess and Mitigate the Project's Impacts to Mountain Lions and Wildlife Connectivity.

The RPFSEIR fails to appropriately respond to the Center's comments regarding mountain lions and wildlife connectivity, stating "[w]ith respect to the portions of the SEIR that were not recirculated, the doctrines of res judicata and collateral estoppel preclude litigation and/or relitigation of those issues states" (RPFSEIR at 2-22) and that "[c]ollateral estoppel bars relitigation of the mountain/wildlife movement *[sic]* and connectivity issues" (RPFSEIR at 2-24). However, as discussed in the Center's May 29, 2025 comment letter, new and significant information regarding the conservation status of local mountain lions and the increasing threats they face, the movement of at least one mountain lion adjacent to the Project area, and the

importance of the existing wildlife connectivity in and near the Project area for their long-term survival has become available since the EIR was certified in 2018.

The California Environmental Quality Act ("CEQA") states that a subsequent or supplemental EIR may be required when either (1) substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report or (2) new information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available. (Pub. Res. Code § 21166.) Below we present clear evidence regarding mountain lions and wildlife connectivity that falls into both categories. Therefore, the RPFSEIR fails to comply with CEQA.

A. Since Project Approval, CDFW has Recommended Mountain Lions in the Project area to be Listed as Threatened under the California Endangered Species Act.

The Project area is located in the Sierra Pelona Mountains, which is within the geographic range of the Southern California and Central Coast mountain lion populations that were petitioned to be listed under the California Endangered Species Act ("CESA") in June 2019 (Yap et al., 2019). In April 2020 these populations were granted "candidacy status" under CESA, such that they are afforded the same protections as other CESA-listed species. And on December 10, 2025, the California Department of Fish and Wildlife ("CDFW") released their status review regarding the petition and recommended listing all of the petitioned mountain lion populations as a threatened Southern California and Central Coast mountain lion distinct population segment (DPS) under CESA (CDFW, 2025a).

CDFW's recommendation relies on numerous scientific studies published after the Northlake EIR was certified in April 2018 that illuminate the dire conditions of the DPS mountain lion populations' genetic health and viability, the myriad threats they face, and the importance of the Project area for their long-term survival (e.g., Benson et al., 2019, 2023; Gustafson et al., 2018, 2021); see the Center's May 29, 2025 comments, the CESA petition [Yap et al., 2019], and the CESA status review [CDFW 2025a] for more studies and details). In particular, CDFW identifies the Sierra Pelona Mountains as a high priority area that is critical to maintain and improve the genetic health of the populations within the DPS because of its proximity to the Tehachapi Mountains, an important area for genetic exchange between the DPS and relatively robust mountain lions in the Western Sierra Nevada (CDFW, 2025a). According to CDFW, "[m]itigating the barriers of Highway 58 and Interstate 5 to allow safer and easier dispersal across those roads should be considered high priorities, as well as the conservation of suitable habitat in the Sierra Pelona, Topatopa, and San Emigdio Mountains" (CDFW, 2025a). The previously certified EIR does not—and cannot—adequately analyze or mitigate impacts of the Project on mountain lions given this wealth of new information.

The Project would result in the destruction of high-priority mountain lion habitat and degradation of a critical connectivity area that is already constrained, which could drive the Southern California and Central Coast mountain lion DPS closer towards extinction. The Project is also located adjacent to a segment of the I-5 that, in 2024, CDFW identified as Barrier ID W231: I-5 Sierra Madre to Castaic Ranges, with mountain lion as a target species for recovery (CDFW, 2024). According to CDFW, "[t]he Sierra Madre-Castaic linkage is vitally important for restoring gene flow to southern California mountain lion populations" (CDFW, 2024).

CEQA requires a "mandatory finding of significance" when a project has the potential to impact a CESA-listed species. (CEQA Guidelines § 15065(a)(1); *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 792 fn. 12.) And such a finding triggers a duty to consider and adopt all feasible alternatives or mitigation measures to reduce such impacts. (Pub. Res. Code § 21002.) Moreover, CESA provides that agencies should not approve projects that could jeopardize the continued existence of this DPS or result in destruction of essential habitat (Fish & Game Code, § 2053(a)) and agencies must require that appropriate mitigation measures be implemented for projects that could destroy mountain lion habitat or impair connectivity. (See Fish & Game Code, § 2054).

The CESA status of local mountain lions as a candidate species in 2020 and a recommended threatened DPS in 2025 and the numerous scientific studies published after the 2018 EIR certification qualify as both (1) substantial changes that require major revisions in the environmental impact report so that it includes adequate analyses and mitigation for the Project's impacts to mountain lions and wildlife connectivity and (2) new information, which was not known and could not have been known at the time the environmental impact report was certified as complete. (Pub. Res. Code § 21166.) The RPFSEIR lacks any analysis or mitigation for the Project's impacts to mountain lions and therefore fails to comply with CEQA.

B. Since Project Approval, at Least One Mountain Lion Traveled from Grasshopper Canyon to Marple Canyon Through an Adjacent Wildlife Crossing.

The Mountains Recreation and Conservation Authority ("MRCA") documented at least one mountain lion using a box culvert under the southbound I-5 that is adjacent to the Project area. Photos, authenticated by the attached declaration from Chad Christensen, the Deputy Chief of Natural Resources and Planning for MRCA, depict a mountain lion crossing from the east side of the southbound direction of the separated I-5 freeway from Grasshopper Canyon westerly into Marple Canyon on November 5, 2020 approximately between 2:49 a.m. and 2:59 a.m. (the "Mountain Lion Photos") (Exhibit A). The single-lane box culvert for the Marple Canyon access road that crosses under this southbound section of I-5 is identified as "Tunnel 2" and "Underpass 2" in Santa Monica Mountains Conservancy's April 17, 2018 letter on the Northlake Development (Exhibit B). Underpass 2 is one of two freeway crossing structures along a ten-mile section of I-5 between Templin Highway and Castaic Creek. The MRCA owns 245 acres of Marple Canyon west of Underpass 2 between the separated north-/southbound sections of I-5 and six acres east of Underpass 2 that connect with Grasshopper Canyon. The Mountain Lion Photos were taken by a camera placed on MRCA conservation lands by Mr. Christensen for the MRCA's Marple Canyon I-5 Wildlife Crossing Enhancement Project.

The use of this crossing by a mountain lion moving west, towards the severely imperiled Central Coast South population that is facing an "extinction vortex" (Benson et al., 2019) from the eastern side of I-5 indicates potential gene flow that is desperately needed. According to researchers, "a single migrant [per generation] can have immediate positive effects on the genetics of a small, isolated and inbred puma population" if the individual successfully breeds (Gustafson et al., 2017). This documented movement adjacent to the Project area highlights the critical value of the Project area as live-in and move-through habitat and for east-west mountain lion movement.

While the approved 2018 EIR for the Northlake Project does generally acknowledge that mountain lions may use the Project area (2018 Final EIR at 2-136), County counsel joined the project proponents (which include Northlake Associates, LLC, which is controlled by NLDP Associates, LLC, Castaic Development Partners, LLC, and Michael Rosenfeld of Woodridge Capital Partners, LLC) in representing in court proceedings that "mountain lions will not be impacted by the Project" and "mountain lions are not using Project site crossings as confirmed by expert studies, including a wildlife camera study . . . ." (Respondents' and Real Parties in Interest's Joint Opposition Trial Brief at pp. 8 & 16-17.) **The Mountain Lion Photos demonstrate that these claims (which were based on a developer-commissioned study) are incorrect.**[1]

The County's own staff biologist, Joseph Decruyenaere, urged the developer's EIR drafters not to minimize the connectivity value of the existing culverts under the I-5, which are far from perfect but are the only available means for mountain lions to cross the I-5 in the area. Mr. Decruyenaere wrote that the EIR language prepared by the developer's consultant:

> unduly minimizes the value of compromised movement opportunities. Nowhere else in biological conservation would you want to argue that because a resource is rare it's less than valuable. The fact that the use of a highly constrained opportunity for movement between natural areas might be made more difficult should always be considered a potentially significant impact unless there simply aren't any wildlife around to use the crossing. If a movement opportunity lacks a vegetated approach or some other feature that would seem to make it work better, that doesn't mean it doesn't pose an opportunity for movement. It just suggests that an animal might be less inclined to use it in the imaginary scenario that they have a better alternative. **However, in the real world, and in the highly fragmented, difficult to navigate landscapes that wildlife are consigned to, compromised movement opportunities may be the only opportunities available.** Revise the discussion to acknowledge the value of the crossings and instead of devaluing them, talk about how the project might change the potential for their use.[2]

Mr. Decruyenaere also wrote that the developer's consultant relies "chiefly on the idea that existing crossing features are not ideal but [they] neglect[] to provide conclusions as to how

[1] On December 17, 2020, the Center for Biological Diversity and Endangered Habitats League requested judicial notice of the Mountain Lion Photos in Los Angeles County Superior Court case *Center for Biological Diversity et al. v. County of Los Angeles et al*., Case No. 19STCP01610, and the County and developer submitted a brief opposing the request for judicial notice. The request was denied, and the Mountain Lion Photos were not considered in the Court's decision.

[2] Mr. Decruyenaere's comments were attached to an email sent by County Planner Jodie Sackett on February 18, 2018 and are accessible in the administrative record ("AR") of the Los Angeles County Superior Court case *Center for Biological Diversity et al. v. County of Los Angeles et al*., Case No. 19STCP01610 at AR025874 (and Mr. Sackett's email is located at AR025825-26).

overall wildlife movement on the site and through the crossing features may actually change with buildout of the project."[3]

The Mountain Lion Photos confirm that mountain lions (and likely other wildlife) can and do use the culvert adjacent to the Project site even if the culvert could be enhanced to be more friendly for wildlife. If built as proposed, the Northlake Development would destroy high quality, intact mountain lion habitat; degrade surrounding habitat with edge effects including but not limited to new roads and increased traffic, lighting at night, noise, rat poisons, disease risk, domestic animals, and wildfire, which could have direct and indirect impacts to mountain lions (e.g., (Barrientos et al., 2023; Benson et al., 2023; Blakey et al., 2022; CDFW, 2025b); block this critical crossing; and further constrain the already-limited movement opportunities for mountain lions and other wildlife in the region.

The Mountain Lion Photos qualify as both (1) a substantial change that requires major revisions in the environmental impact report so that it includes adequate analyses and mitigation for the Project's impacts to mountain lions and wildlife connectivity and (2) new information, which was not known and could not have been known at the time the environmental impact report was certified as complete. (Pub. Res. Code § 21166.) The documented use of this crossing by a mountain lion, new scientific studies identifying the vulnerability of the region's mountain lions to extinction and the importance of the Project area for mountain lion habitat and connectivity (and therefore the genetic health of populations within the DPS), and CDFW's recommendation to list local mountain lions as threatened under CESA illuminate the major deficiencies in the previously certified EIR and precipitate the need of new analyses of the Project's impacts to mountain lions and wildlife connectivity in the RPFSEIR. (See *Moss v. County of Humboldt* (2008) 162 Cal.App.4th 1041 [finding supplemental environmental review was required when there was mere anecdotal evidence of a listed species newly occurring in the project area].)

C. New Data Indicate the Project Area is Important for Mountain Lions and Wildlife Movement.

The Project area is located in a focal area for recent and ongoing wildlife connectivity and mountain lion studies. As mentioned previously, CDFW has identified the I-5 as an important barrier to mitigate to improve gene flow in the Southern California/Central Coast mountain lion DPS, in part because of the area's importance for statewide gene flow and there is high quality suitable mountain lion habitat on both sides of the freeway. These studies aim to help decisionmakers understand how mountain lions are moving through the area and how conditions could be improved to support more movement. From 2022 to 2025, the UC Davis California Carnivores Program collected movement data from several individuals that were radio-collared west of I-5 and north of SR-138 as part of the first phase of their ongoing study, "Understanding ecological and human-related factors affecting felid movement in a critical wildlife linkage" (Figure 1). The study area was focused in the Tehachapi Mountains linkage, north of the Project area. In October 2025 the UC Davis California Carnivores Program began the second phase of their study, expanding southward to investigate mountain lion movement in

[3] Mr. Decruyenaere's comments are included in an email sent on February 12, 2018, and is available at AR025822-23.

the Castaic Study Area (Figure 2). January 2026 was their first month of attempting captures, and they have already collared two individuals west of I-5 (Figure 3).

In addition to the radio-collar data, a young injured mountain lion cub was found in Castaic, on Hillcrest Parkway near Olympic Street, on January 21, 2026. And witnesses observed a mom and sibling mountain lion nearby. The presence of these mountain lions in Castaic indicates suitable habitat in the vicinity, including in the Project area. And when the young mountain lions become old enough, they will need suitable habitat and connectivity to safely disperse and find their own territories.

The data indicate that mountain lions are present and moving through the landscape quite widely while also showing the I-5 is a formidable barrier to movement. This highlights the importance of every single time a mountain lion is able to successfully cross the I-5 through the limited culverts. Although mountain lions east of I-5 and south of SR-138 have not yet been collared, the UC Davis researchers are planning to collar mountain lions in the area as part of the study. Given the data of mountain lion movement west side of I-5 and the high quality habitat east of I-5, mountain lions are likely living in and moving through the Project area.

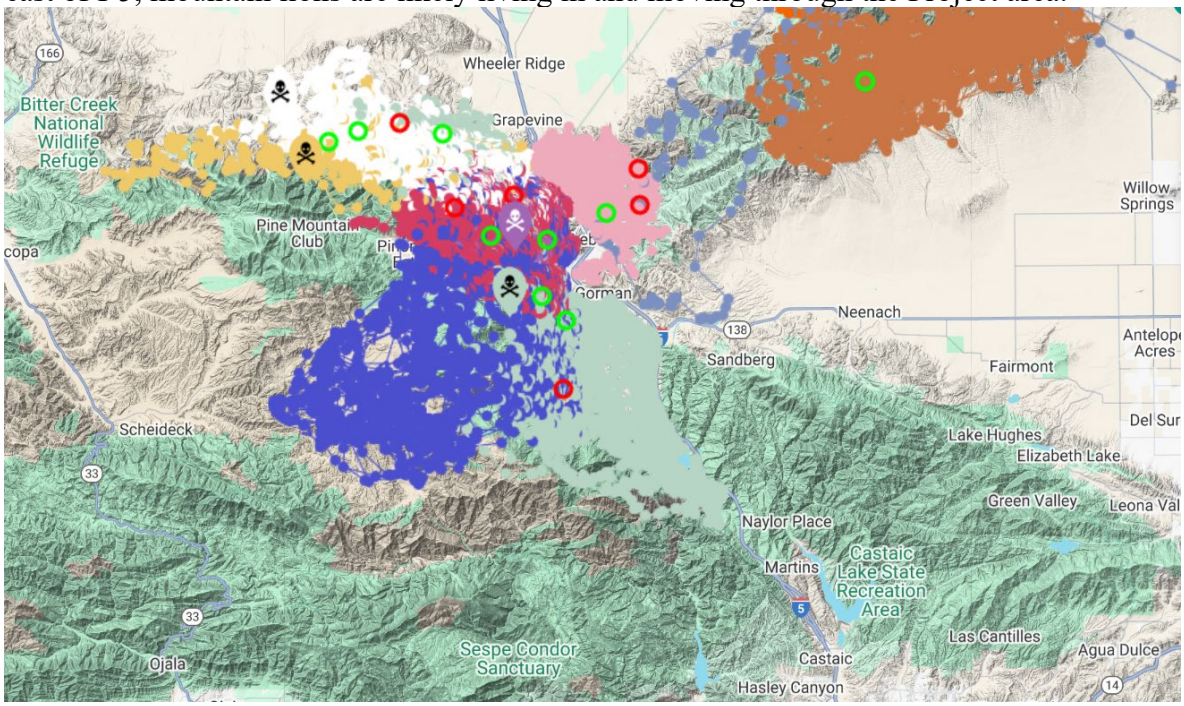


Figure 1: The last 18 months of radio-collar data from individuals captured in the first phase (2022-2025) of the UC Davis California Carnivores Program study.

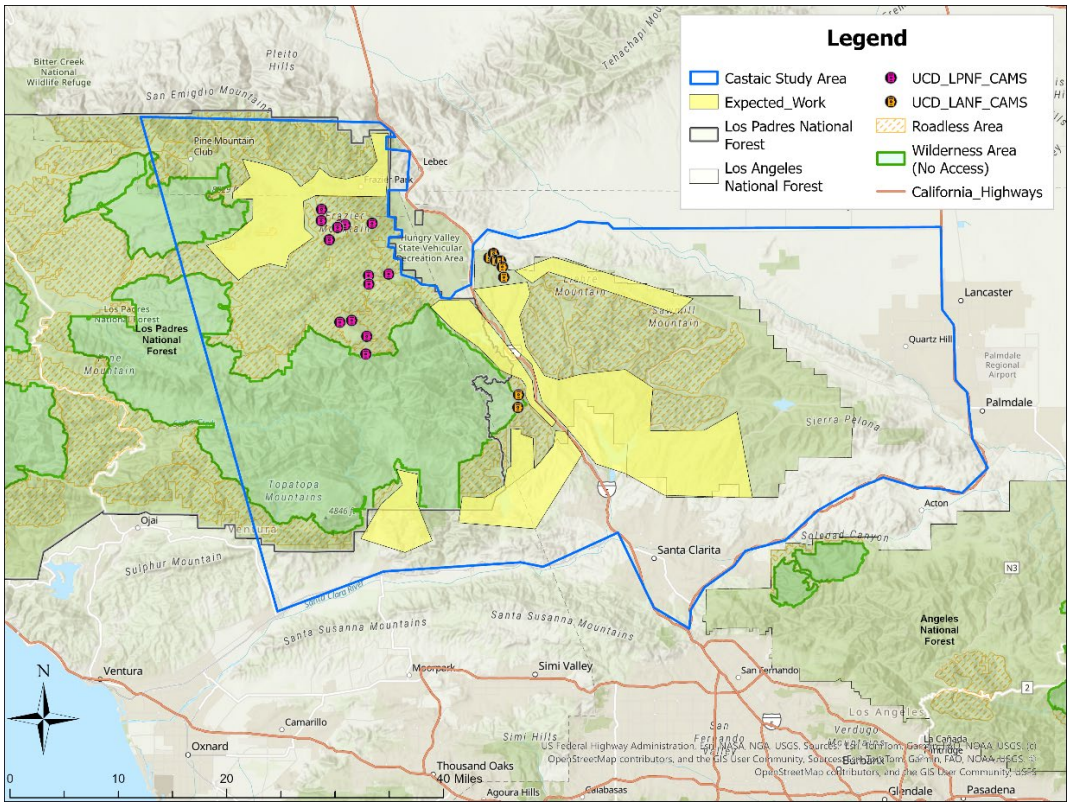


Figure 2: The UC Davis California Carnivores Program Castaic Study Area. This encompasses the second phase of the study, which began in October 2025.

Figure 3: GPS collar data from the first two mountain lions collared in the Castaic Study Area. These lions were captured and collared in January 2026.

Meanwhile, the Mountains Recreation and Conservation Authority ("MRCA") is leading a wildlife connectivity study in the area for their "Interstate 5 (Sierra Madre-Castaic) Wildlife Crossing Infrastructure Assessment and Implementation Plan," which began in December 2025. Their study includes roadkill surveys and wildlife cameras set up at culverts along I-5, including along the section of I-5 that is near the Project area. Importantly, in the first two months since they placed cameras at culverts along I-5, they have documented three instances of a mountain lion using culverts less than four miles from the northernmost portion of the Project area (Figure 4). Mountain lion home ranges can be large, depending on the sex and life stage (i.e., females tend to have smaller home ranges than males, females denning with kittens shrink their home ranges, and dispersing subadult mountain lions can travel long distances). For example, in the nearby Santa Monica Mountains, home ranges were found to be an average of 52 mi^2 for females and 144 mi^2 for males in the nearby (Riley et al., 2021). And dispersing mountain lions in Southern California have been documented traveling 50 to 93 miles (Vickers et al., 2015). Given their large home ranges and long-distance traveling behaviors, it is not inconceivable that the mountain lions documented in nearby culverts could move through the Project area and be impacted by new development there. In addition, other wildlife have been documented using the culverts (Figure 5), indicating these culverts provide important connectivity for other wildlife in the region.

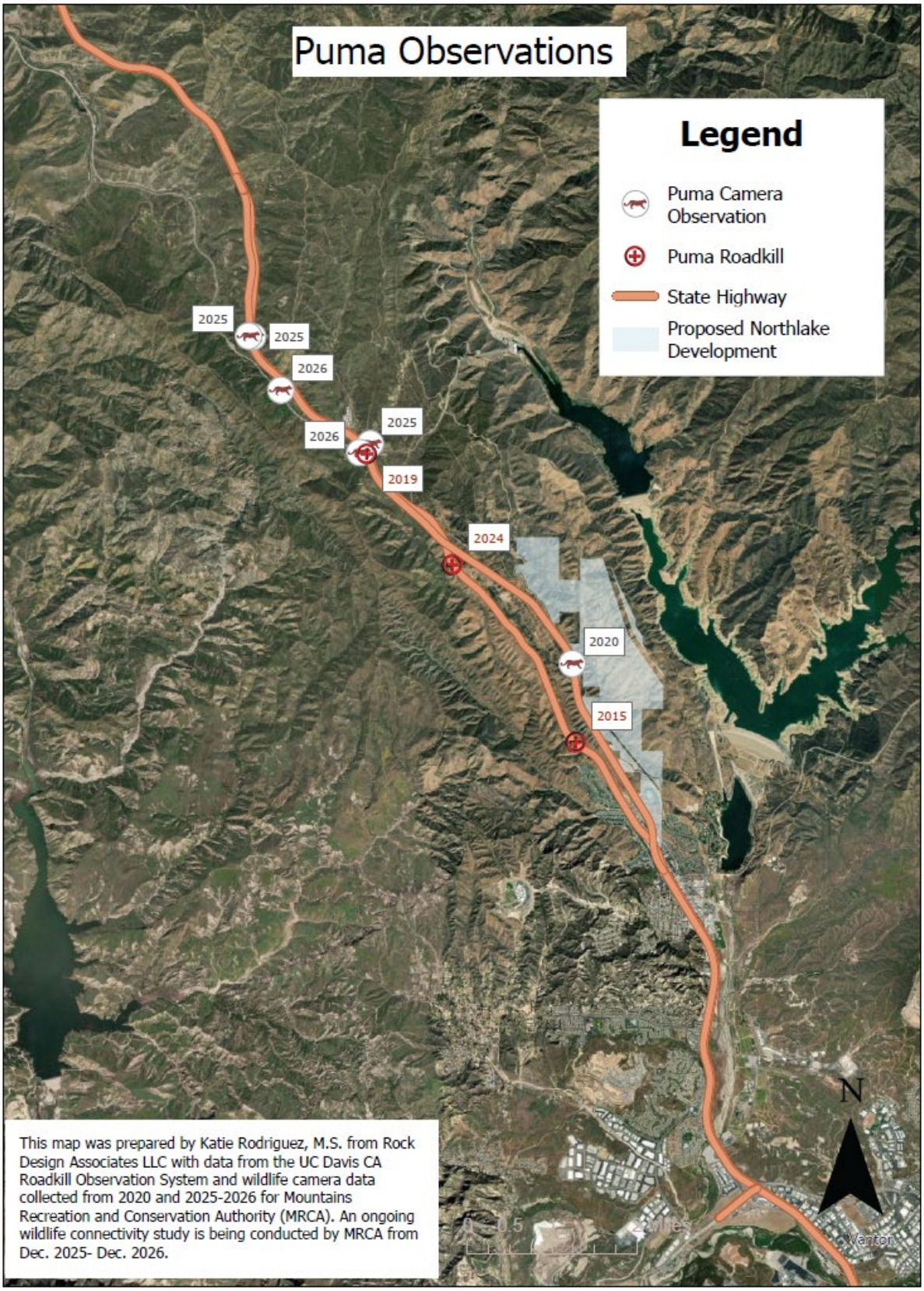


Figure 4: I-5 Mountain lion observation data from MRCA's ongoing wildlife connectivity study.

Figure 4: I-5 Other wildlife observation data from MRCA's ongoing wildlife connectivity study.

II. The RPFSEIR Continues to Provide Insufficient Analysis and Mitigation for Impacts to Western Spadefoot.

The RPFSEIR did not substantially address concerns raised in the Center's May 29, 2025 comment letter regarding the PRDSEIR related to the importance of the western spadefoot (referred to as "WST" in the RPFSEIR) population present at the Project site, the interpretation of previous studies, the uncertainty of success for artificial pools providing adequate breeding habitat, or the importance of connectivity. Instead, the RPFSEIR's primary response is to explain that the Habitat Mitigation and Monitoring Plan ("HMMP") has been approved by CDFW (RPFSEIR 2-28, 29). The RPFSEIR further claims that our previous comment "provides no credible evidence of a potential significant impact not already addressed in the WST analysis or fully mitigated to CDFW's satisfaction."

On the contrary, the Center's May 29, 2025 comment letter explains the uncertainty around long-term success of artificial breeding pools, the importance of redundancy given recent history of drought in California, and the importance of landscape connectivity, as restated below. Regardless of CDFW's approval, the EIR fails to respond to the comment or address the concern, as detailed below.

A. The RPFSEIR Continues to Minimize the Importance of the Project Site for Western Spadefoot.

The RPFSEIR continues to minimize the importance of the western spadefoot population present at the Project site. The RPFSEIR includes no changes regarding western spadefoot analysis and impacts. As such, the RPFSEIR continues to claim that "WST populations are not rare in the nearby areas." (WST Plan, p.7). As described in our previous letter, this claim is contrary to the Applicant's own description in the 2017 Draft Supplemental Environmental Impact Report ("DSEIR"), which states that "the Grasshopper Canyon population is one of few known populations in the region" (DSEIR p. 5.2-36) (and which is quoted in a June 15, 2017 comment letter submitted by CDFW). The claim is also contrary to available evidence regarding the presence of western spadefoot in the region and the current status of western spadefoot populations.

As described in the May 29, 2025 comment letter, we conducted a query of the California Natural Diversity Database ("CNDDB") western spadefoot occurrences on May 21, 2025 including the Mint Canyon, Newhall, Val Verde, and Whitaker Peak, and San Fernando 7.5 Minute Quadrangles ("quads") (note that we included additional quads that were further from the Project site than those displayed in the PRDSEIR to capture the entire Santa Clarita Valley). Our search resulted in 44 total observations, including those at the Project site in the Whitaker Peak quad. Of these observations, only 10 had occurrence ranks (a ranking of the quality of the habitat and the condition of the population at that location) of "Good" or "Excellent;" 10 others were "Fair," 10 were "Poor," 14 were "Unknown" and one was "Possibly extirpated." The CNDDB results therefore do not necessarily indicate a healthy, widespread population—rather, they show that western spadefoot do occur in the area, but while numerous populations appear healthy, numerous others are likely struggling. Importantly, many of the populations in and around the Santa Clarita Valley are highly fragmented and surrounded by roads and development. Such urbanization and development reduce regional and local connectivity across the landscape, isolating these remaining populations. When isolated populations experience years with low reproductive success or become locally extirpated, recovery is difficult because they no longer

have adjacent subpopulations to supply individuals and boost the population or facilitate re-establishment. Therefore, urban development that destroys remaining habitat and continues to fragment dwindling spadefoot populations leads to higher risks of local and regional extinction (Neal et al., 2020). We do not dispute the fact that western spadefoot occur south and west of the project, but this does not mean they are common, and it certainly does not mean they are free from risk of regional decline.

Additionally, the population at the Project site lies in an important location in the species' range, considering western spadefoot biogeography. Western spadefoot in Southern California (south of the Transverse Ranges) are genetically distinct from western spadefoots in central and northern California (Neal et al., 2018). The western spadefoot present in the Project area belong to the southern population. As detailed in a recent Center petition to list western spadefoot as threatened or endangered under CESA, the southern population has experienced more severe declines than the northern population (although both populations have been heavily impacted by habitat loss and continue to decline) (Prado-Irwin, 2025). The population present at the Project site lies at the northernmost extent of the southern western spadefoot population. If the western spadefoot population currently present at the Project site is lost, the range of the southern population will shrink, furthering the pattern of regional decline.

Importantly, very little suitable habitat remains in Los Angeles County or surrounding counties (Rose et al., 2022), so fully protecting the habitat that remains—especially occupied habitat like that which occurs at the Project site–is essential. The Project site represents the last large, undeveloped, core habitat for western spadefoot in the entire County. Thus while the PRDEIR is correct in observing that other populations occur in and around the Santa Clarita Valley, it is important to recognize that this does not diminish the importance of the population at the Project site, especially considering the intact habitat present at the Project site, the lack of suitable habitat in the rest of the County, and the population's position at the northern edge of the southern population's range.

B. The RPFSEIR Still Fails to Provide an Adequate Baseline Regarding Western Spadefoot Presence.

In addition to the issues described above regarding the importance of the western spadefoot population at the Project site, the RPFSEIR also fails to provide sufficient information to establish a reliable environmental baseline at the Project site regarding potential western spadefoot habitat and western spadefoot presence.

The WST Plan states that "WST was observed on the NorthLake Project site during various general and focused amphibian surveys as well as during focused surveys for listed fairy shrimp within seasonal pools" and "While numerous ephemeral ponds and features have been observed on the Project site over time with respect to various surveys for different species, at no time have more than 3 features been observed to contain WST and one additional feature was observed to contain potential WST habitat, despite no WST being observed." (WST Plan, p. 7).

Importantly, the analysis of suitable habitat for western spadefoot was initially extrapolated from surveys for suitable habitat for fairy shrimp, as stated in the WST Plan: "A determination for the extent of suitable habitat for WST is possible from the data collected during wet-season fairy shrimp surveys in 2004/2005, which was one of the wettest rainfall years in the last 50 years" (WST Plan, p. 8). However, fairy shrimp and western spadefoots do not have the same habitat requirements. Fairy shrimp generally occupy clay-pan vernal pools.

Western spadefoots occupy these types of pools as well, but can also breed in many other temporary water bodies, including ditches, erosion cuts, road ruts, and ephemeral streams (Baumberger et al., 2019; Stebbins, 2003).

The WST Plan goes on to state that "In 2014, surveys for fairy shrimp and amphibians, were conducted" (WST Plan, p. 9) but fails to provide any details on survey methodology. It is unclear whether the 2014 surveys used the same methods as the 2004/2005 surveys, in which case non-vernal pool habitats would likely be overlooked, or used a different methodology. Further, the WST Plan provides no information regarding the geographic scope of either survey (2004/2005 or 2014). It is completely unclear whether the entire site was even surveyed for western spadefoot. If indeed the surveys were based on methodology intended to identify vernal pools, they would likely have excluded higher elevation areas or habitats like Grasshopper Creek and temporary pools along eroded areas or defunct roads.

If additional suitable breeding pools do exist at the Project site, based on the survey methodology, it is likely that they would not have been detected. Surveys focused on fairy shrimp in 2004/2005 would have likely excluded water bodies that contain suitable western spadefoot habitat but were not suitable for fairy shrimp. And surveys in 2014, which did target western spadefoot, would not necessarily have detected additional pools due to the "lower-than-average rainfall" that year (WST Plan, p.9). Aside from the lack of detail on the area surveyed, the survey methodology simply does not guarantee that all suitable western spadefoot habitat would have been detected.

Additional temporary waters could occur in many geologic features throughout the Project site, including along small canyons or areas with sandstone erosion, along defunct access roads, and especially in the upstream areas of the ephemeral Grasshopper Creek that experience low and intermittent flows. Given the fact that western spadefoot occupy upland habitat up to 600 meters away from breeding pools (Halstead et al., 2021), if ponding features are present across more of the Project site than presented in the WST Plan—which is likely given the landscape—much of the Project site would present suitable habitat and could be occupied by western spadefoot. However, because the RPFSEIR does provide any detail on how much of the Project site was surveyed, when it what seasons the surveys occurred, or what the climatic conditions of the site were during these surveys, it is impossible to know the extent of the western spadefoot population. It is entirely possible that western spadefoot are much more common throughout the Project site than the RPFSEIR claims, in which case the impacts to this sensitive species from Project construction and operation would be highly significant and potentially catastrophic.

Under CEQA, an environmental review document must evaluate the potential environmental impacts of the project as compared to the existing environmental conditions (the "baseline"), so that the Project's impacts can be meaningfully analyzed and compared to alternatives. (CEQA Guidelines § 15125(a); see County of Amador v. El Dorado County Water Agency (1999) 76 Cal.App.4th 931, 952; Neighbors for Smart Rail v. LA County Metropolitan Transit Authority (2013) 57 Cal.4th 310, 315.) The information provided in the RPFSEIR regarding the presence of suitable western spadefoot habitat does not meet this standard.

C. The Proposed Mitigation for Impacts to Western Spadefoot Remains Insufficient.

As we described in the May 29, 2025 comment letter, the mitigation for impacts to western spadefoot in the form of mitigation ponds is improved from previous environmental review documents, but is still not sufficient to ensure long-term population persistence.

The RPFSEIR claims that "it is speculation to assume that onsite pools will not be successful and thus additional ponds at different locations will be needed." (RPFSEIR at 2-29). However, we do not assume the onsite pools will not be successful without evidence. Rather, the evidence cited in the PRDEIR itself shows that success rates of artificial pools are not 100%. Based on the results of the study conducted by Baumberger et al (2020) and referenced in the PRDSEIR, it is entirely reasonable to expect that some pools may not be successful.

As we wrote in our previous comment letter, Baumberger (2020) investigated the success of artificial breeding pools that were created in 2006 as mitigation for impacts to ten breeding pools at a site in East Orange. The mitigation for this project included the creation of 21 pools to mitigate for the 10 affected pools, providing a total mitigation ratio of 2.1:1. Fifteen of these pools (which became 14 when two pools merged together) were in Irvine Mesa, and six were in Shoestring Canyon. In Shoestring Canyon, all six mitigation pools failed to hold water and breeding western spadefoot were completely absent from the pools and the nearby creek bed during the 2016 survey period (Baumberger et al., 2020). The PRDEIR omits this information, focusing only on the pools in Irvine Mesa, which had higher rates of success, thereby misrepresenting the success of the mitigation and making it appear to be more successful than it was.

Further, the PRDSEIR quotes the following excerpt of the study itself, claiming that this excerpt shows WST breeding in 12 of the 14 pools on Irvine Mesa (WST Plan, p.31):

> Twelve of the 14 mitigation pools at Irvine Mesa held water for >30 d. During our 2016 surveys, two of the mitigation pools built by Glenn Lukos Associates, Inc. merged (Pools 5 and 9) and we considered them as one pool (Pool 9). We detected *S. hammondii* tadpoles in eight of the Irvine Mesa mitigation pools but documented successful breeding through metamorphosis at only seven of these pools in April 2016 due to desiccation and/or water quality.

However, the PRDSEIR misrepresents the findings of this study. This excerpt only says that 12 of the 14 pools held water for >30 days, but merely holding water does not necessarily mean that western spadefoot were breeding in those pools. In fact, the sentence following this excerpt states "*Spea hammondii* did not breed in all the pools with hydroperiods >30 d (Table 3)." (Baumberger et al., 2020). The excerpt itself states that tadpoles were only detected in eight of the pools, and breeding through metamorphosis was only observed at seven of the pools. It is difficult to understand therefore why the PRDSEIR claims that western spadefoot were breeding in 12 of the 14 pools in 2016, when the very excerpt they cite to support this statement says WST only bred in seven of these pools.

The PRDSEIR is misleading and falsely claims that the study's artificial mitigation pools were more successful during the drought year of 2016 than the reality. In fact, only ½ (7/14) of the pools in Irvine Mesa showed successful breeding in 2016, and 0/6 of the pools in Shoestring Canyon showed successful breeding, leading to an overall success rate of just 35% (7/20). Thus the mitigation ratio of 2:1 implemented in the study did not even successfully mitigate for the full impacts to the ten original pools.

The PRDSEIR notes that the 2016 study occurred during a drought year, and that monitoring of the following 2016/2017 season showed tadpoles in 12 of the pools and "extensive breeding was present" (WST Plan p.31). The reference cited to support this claim is not published and is not publicly available (as far as we can ascertain), so it is impossible to determine whether the "12 pools" refers to pools in Irvine Mesa only or in Irvine Mesa and Shoestring Canyon, and therefore it is impossible to determine the overall efficacy of the mitigation during this "ideal" wet year. It appears likely that the study refers only to Irvine Mesa, in which case the population did show a notable increase in pool occupation, but the exclusion of Shoestring Canyon remains unexplained.

Given the variable conditions experienced by vernal pools including drought—which can last for years in California and is expected to become more common in the future (Diffenbaugh et al., 2015)—reliance on a simple 1:1 replacement, which is what the RPFSEIR does, is not sufficient to mitigate for impacts to breeding habitat by creating artificial pools.

The RPFSEIR should take into account the fact that, habitat loss and species displacement from construction of the proposed Project are immediate, while any gains from their mitigation are uncertain. Moilanen et al. (2009) found that "very high offset ratios may be needed to guarantee a robustly fair exchange" and that "considerations of uncertainty, correlated success/failure, and time discounting should be included in the determination of the offset ratio to avoid a significant risk that the exchange is unfavorable for conservation in the long run." Restoring complex ecosystems like ephemeral wetlands often results in reduced ecological function. In studies conducted in California on wetland mitigation sites permitted between 1979 and 2002, less than 20% of mitigated wetlands were performing optimally (Ambrose et al., 2006; Sudol & Ambrose, 2002).

Given the importance of vernal pools and associated upland (heterogeneous) habitat to western spadefoots and numerous other native, rare, and special-status animals and plants, connectivity, and overall biodiversity, the RPFSEIR should provide higher mitigation ratios. In addition, mitigation ratios need to take the types of mitigation to be implemented into consideration, as not all mitigation is created equal. Restoration, enhancement, and creation of habitats can have limited success due to the challenges of establishing the appropriate hydrology when compared to preservation of existing habitats (Matthews & Endress, 2008; Stein et al., 2018; Sudol & Ambrose, 2002; Windmiller & Calhoun, 2007). Scientific studies specifically speak to the need for higher mitigation ratios (along with long-term monitoring, identified and measurable success criteria, and adaptive management strategies) to improve chances of adequately mitigating impacts to habitats and species (Matthews & Endress, 2008; Mitsch & Wilson, 1996; Moilanen et al., 2009; Stein et al., 2018; Sudol & Ambrose, 2002; Windmiller & Calhoun, 2007; Zedler & Callaway, 1999). The western spadefoot's continued survival relies on created wetlands having the appropriate hydrological and biological conditions and adequate upland habitat.

Given that western spadefoots have been extirpated from 80% of their range in Southern California (Stebbins & McGinnis, 2012; US Fish and Wildlife Service, 2005) and amphibian populations in the U.S. are declining at an alarming rate of almost 4% per year (Grant et al., 2016), a higher mitigation ratio than the approximate 1:1 ratio employed by the RPFSEIR is necessary.

Further, the proposed mitigation ponds are very clustered, unlike the current pond arrangement. Currently, the stock pond is approximately 4,000ft away from the seasonal ponds, which are all within approximately 100-400ft of one another (including VP-6/Pond 3) (WST Plan, Exhibit 4). However, the proposed mitigation ponds are all clustered very close together on the west side of the property, within 50ft of one another (WST Plan, Exhibit 5). The PRDSEIR claims that "total acreage as opposed to number of ponds is all that is relevant" (WST Plan, p.18). However, this claim does not consider the importance of landscape connectivity and potential metapopulation dynamics.

The natural history of western spadefoots makes them vulnerable to climate and habitat disturbances. Given the variation in geology, hydrology, climate, and habitat across a landscape, if one population declines or becomes extirpated, it is possible that others nearby can survive and re-colonize. Importantly, high pool density per se is not a problem. We acknowledge that high density of a pool complex can be quite beneficial for connectivity between pools and vernal pool complex hydrology. However, in placing the planned vernal pools so close to one another, and only creating two vernal pools, the Project design has minimized the amount of upland habitat available around the vernal pools and decreased the likelihood of population resilience in the case of an extreme disturbance. If the ponds are clustered, any extreme climatic events or random disturbances are likely to impact all of them in similar ways. On the contrary, if ponds are more spread out across the landscape, the local population is more resilient to random disturbance and potential climatic, hydrological, and ecological changes as well. The RPFSEIR does not address this point at all, and continues to claim that creating two ponds clustered close to one another is sufficient to maintain the spadefoot population at this site. The RPFSEIR fails to consider the importance of redundancy and landscape connectivity to population resilience, especially for a demographically unstable species like western spadefoot. Their high demographic instability makes them particularly sensitive to habitat alterations that may interfere with recolonization and reestablishment after unsuccessful recruitment years (Fisher & Shaffer, 1996).

Western spadefoot populations are often able to persist in the face of environmental variability due to metapopulation connectivity; when one population experiences decline, migrants from surrounding populations can bolster the population and prevent local extirpation. As climate change impacts become more severe and extreme weather events continue to occur, shifts in hydroperiod and increased temperatures expected to become more extreme (Montrone et al., 2019; Pyke, 2004; Thomson et al., 2016), and such population dynamics are likely to be increasingly important for species persistence. Due to reduced connectivity between suitable habitats, populations that are unable to successfully breed may decline and disappear and will be unable to be re-established by neighboring populations, leading to further permanent species decline. It is therefore highly important to consider habitat connectivity between upland and aquatic habitat as well as between different pools and pool complexes.

In Southern California, western spadefoot populations have become extremely fragmented, and persistence of remaining subpopulations of is fragile (Halstead et al., 2021; Neal, 2019; Neal et al., 2020). Additionally, it is more important than ever to prioritize climate resiliency as both drought and extreme storms become more common in California (Diffenbaugh et al., 2015; Swain et al., 2018).

The proposed mitigation therefore remains insufficient because a) the mitigation ratio is too low, and does not provide sufficient replacement habitat in the form of artificial pools and b) the ponds are too close together, increasing the risk of extirpation compared to more dispersed

aquatic habitat. The RPFSEIR thus fails to adequately analyze or mitigate impacts to western spadefoot.

III. The RPFSEIR Dangerously Dismisses the Increased Ignition Risk and Harms to People, Communities, and Wildlife Due from the Project.

The RPFSEIR fails to adequately assess and mitigate the Project's impacts on wildfire risk, and the RPFSEIR's responses to the Center's comments regarding the Project's impacts to wildfire risk are insufficient. The responses mostly point to technical appendices D-1, D-2, and K, which lack adequate analyses and unsubstantiated conclusions. Neither the responses nor the appendices resolve the concerns raised in the Center's May 29, 2025 comment letter. Although Appendix D-1 acknowledges that "the expected fire behavior in the interface of the Northlake development indicates that the fire behavior could produce extreme fire behavior" (RPFSEIR Appendix D-1 at 5), the RPFSEIR somehow, and without providing substantial evidence or using the best available science, concludes that the Project's impacts to wildfire risk are less than significant.

A. The RPFSEIR Overly Relies on Over-burdened Wildfire Protection Services and Resources.

The Project will put more families and structures in harm's way without adequate safeguards for their health and well-being. For example, the RPFSEIR skirts responsibility for when (not if) a fire occurs, stating, "[w]here fires are initialized within the Project Site or near its boundary, the fire incident command and control will have to determine if the population will be moved or "sheltered in place"." (RPFSEIR Appendix D-1 at 5). The Project proponent essentially passes off responsibility for community safety to the County, which has repeatedly failed to keep residents safe from wildfire.

An after action review of the 2018 Woolsey Fire, which resulted in three deaths and more than 1,600 structures destroyed in Los Angeles and Ventura counties, identified that the responding agencies were "overwhelmed" by the fire's "speed and weight of impact" and lacked sufficient trained staff, clear policies and protocols, crisis communication, inter-agency and inter-jurisdictional collaboration, situational awareness, real-time data availability with coordinated response tools, emergency preparedness, and evacuation plans (Citygate Associates, 2019). These same issues have come up in other wildfire disasters throughout the state that occurred around the same time, including the 2017 Tubbs Fire (County of Sonoma, 2018) and 2018 Camp Fire (Constant Associates, 2020).

Despite these reports on lessons learned from fires that occurred seven years ago, the County of Los Angeles and likely many other counties have failed to make the necessary improvements. This is evident with the response to the Eaton and Palisades fires. The County was plagued with the same problems as previous fires, which led to fatal errors and destruction (Jarvie, 2025; McChrystal Group, 2025). Lack of funding, insufficient staffing, unclear and outdated evacuation protocols, limited firefighting resources, insufficient communications and alerts, and more resulted in the death of at least 31 people, the destruction of more than 17,000 structures, and the loss and upheaval of many communities that will be recovering for years to come.

The appendix provides "a simple decision tree for evacuation vs. protecting people in place" (RPFSEIR Appendix D-1 at 75). However, as detailed in the numerous incident reviews

cited above, such decisions while navigating these crises are anything but simple, particularly at a time when wildfires are moving faster and climate change is amplifying extreme weather conditions and wildfire risk (Goss et al., 2020; Swain, 2021; Swain et al., 2018, 2025). The after action review of the Woolsey Fire states, "the size and speed of the Woolsey Fire, at times, outpaced the early efforts of some of the largest and most experienced and capable agencies in the United States" (Citygate Associates, 2019). The review also highlights the need to manage the public's "unrealistic expectations" of agency abilities to protect communities from fire, stating, "[w]e cannot expect that all population growth in Very High or High Fire Hazard Severity areas can be protected simply by increasing resiliency [hardening buildings, fuels treatment, and vegetation management] to wildfire and by adding more fire engines" (Citygate Associates, 2019). The RPFSEIR cannot rely on "fire incident command and control" to keep people safe from wildfire while adding to the burden by placing more people and structures in high fire-prone areas.

In addition, relying on sheltering in place if evacuation becomes infeasible has no basis in U.S. fire safety standards and cannot protect thousands of residents in a fast-moving wildfire. While some measures can reduce fire risk, they do not make structures or communities fire*proof*. Experts found that 56% of homes built to Chapter 7A fire-safety codes burned in the 2018 Camp Fire (Knapp et al., 2021). And such measures do not prevent structure-to-structure fire spread during extreme wind events (Knapp et al., 2021; Zamanialaei et al., 2025). Without population-level standards or evidence that thousands of residents could survive while trapped inside their homes or "safety zones" or "areas of refuge" to be identified after a fire has already been ignited (RPFSEIR Appendix D-1 at 76), sheltering in place cannot be an option.

The RPFSEIR also relies on a new fire station that may not ever get built. According to the appendix, "[a] site will be provided for a new fire station within the development. In addition, the project will pay its proportionate fees for the construction of that station which will enhance the regional fire protection already in place" (RPFSEIR Appendix D-1 at 4). However, as mentioned in the Center's May 29, 2025 comment letter, there is no guarantee that a fire station would actually be built. And even if it were to be built, it is unclear if human and monetary capital will be sufficient to sustain and maintain a new fire station. There is no requirement that the developer pay for the county's costs of building or operating a station, nor is there any guarantee that sufficient firefighting personnel and equipment will be available. During the LA wildfires in January 2025, firefighters lacked enough personnel and fire engines to keep all communities safe (Fuller et al., 2025; Toohey & Fry, 2025). The personnel cost over the life of the Project (essentially forever) will likely be hundreds of millions of dollars. Funding is already lacking for the increasing costs of fire suppression and property damage from wildfires in California, and the developer is not required to reimburse the California Department of Forestry and Fire Protection (CalFire) for the many millions (or billions) of dollars CalFire will likely expense when (not if) Centennial needs to be defended from wildfire. The cost of fire suppression in areas managed by CalFire has skyrocketed from $114 million in the 2000-2001 fiscal year to close to $3 billion for the 2020-2021 and 2021-2022 fiscal years combined (CalFire 2022). The Legislative Analyst's Office (LAO) reported that CalFire used an estimated $3.3 billion for wildfire protection and suppression in the 2022-2023 fiscal year (LAO 2023). And as mentioned previously, climate change is amplifying extreme weather conditions and wildfire risk (Goss et al., 2020; Swain, 2021; Swain et al., 2018, 2025), which is making it more challenging to protect communities from wildfire. Such information must be analyzed when assessing wildfire risk.

This build now, deal with it later approach is no way to house Californians.

B. The Project's Impacts to Wildfire Risk are Significant and Unavoidable.

The RPFSEIR erroneously concludes that the Project's impacts to wildfire risk are less than significant. The RPFSEIR states that the Center's May 29, 2025 letter "provided no credible evidence of a significant wildfire impact" (RPFSEIR at 2-27), which is false. We provided ample scientific evidence that is specific to California ecosystems and land use practices that unequivocally highlights that placing new developments in fire-prone habitats increases ignition risk. As mentioned in the Center's May 29, 2025 comment letter, reckless land-use planning that extends the wildlife-urban interface ("WUI") further into California's fire-prone landscape is causing fires to be more destructive. Almost all destructive wildfires are accidentally ignited by humans or human infrastructure near roads and development (Balch et al., 2024; Chen & Jin, 2022; Keeley & Syphard, 2018; Syphard et al., 2019).

According to a report from Governor Gavin Newsom's Office, construction of more homes in the wildland-urban interface is one of the main factors that "magnify the wildfire threat and place substantially more people and property at risk than ever before" (Governor Newsom's Strike Force, 2019). Another 2019 study found that housing and human infrastructure in fire-prone wildlands are the main drivers of fire ignitions and structure loss (Syphard et al., 2019). Sprawl developments extending into habitats that are prone to fire have led to more frequent wildfires caused by human ignitions, like power lines, arson, improperly disposed cigarette butts, debris burning, fireworks, campfires, or sparks from cars or equipment (Alexandre, Stewart, Keuler, et al., 2016; Alexandre, Stewart, Mockrin, et al., 2016; Balch et al., 2017; Bistinas et al., 2013; Keeley et al., 1999; Keeley & Fotheringham, 2003; Keeley & Syphard, 2018; Radeloff et al., 2018; Syphard et al., 2007, 2012, 2019).

Yet the RPFSEIR dismisses this established science, simply stating "Appendix K (Wildland Fire Risk Report Northlake Project Addendum #1) specifically addresses risk from new human presence in high fire-prone areas and the wildlife-urban interface (WUI) and concluded that "the increased wildfire risk from human-ignited wildfire is less than significant"" (RPFSEIR at 2-27). However, upon inspection of Appendix K, the RPFSEIR fails to provide credible evidence that supports their conclusions. The appendix seemingly avoids recent California studies, opting instead to highlight one 2009 California study and a few studies conducted in central Texas and Canada to argue that "at a point of development density, wildland fuels are reduced/eliminated or fragmented to a point where fire suppression effort are more effective" (RPFSEIR Appendix K at 2). However, this rationale is false and dangerously misleading. Although previous studies have found that low to intermediate development density surrounded by vegetation had the greatest risk of burning in a wildfire (*i.e.*, Syphard et al., 2012), more recent analyses show that once structures ignite in high-density development, there is an increased risk of fire through structure-to-structure spread (Knapp et al., 2021; Mockrin et al., 2023; Zamanialaei et al., 2025). Wildfires in the WUI since 2017 demonstrate this falsehood. High density development was extremely vulnerable and many lives and homes were lost in Santa Rosa, Paradise, Palisades, and Altadena in the 2017 Tubbs Fire, the 2018 Camp Fire, the 2025 Palisades Fire, and the 2025 Eaton Fire, respectively. To dismiss these horrific tragedies is a complete failure to analyze relevant information that is necessary to keep communities safe. The RPFSEIR endangers families by ignoring glaring truths and excluding analyses of these recent California wildfires.

C. Wildfire in the Wildland Urban Interface Leads to Harmful Air Quality and Health Impacts

The RPFSEIR fails to adequately respond to the Center's comments regarding how wildfires in the WUI cause poor air quality and therefore harm people, stating the following:

> "[c]ommenter speculates that an unintentional wildfire in the Project Area would result in poor air quality; none of the commenter's citations are Project Site specific. CEQA does not require the analysis of speculative impacts. (CEQA Guidelines Section 15145.) Commenter provided no credible evidence of a significant wildfire impact" (RPFSEIR at 2-27).

This is false. Such impacts are not mere speculation. Providing evidence that is site-specific to Northlake is unnecessary. When unintentional wildfires occur, science and experience show (and common sense dictates) that burning vegetation and structures filled with toxic metals, plastics, and other hazardous chemicals release $PM_{2.5}$ and toxic smoke, and such air pollution harms people. Numerous scientific studies provided with the Center's May 29, 2025 comment letter support the fact that wildfires result in an increases fine particulate matter ($PM_{2.5}$) exposure, which has been found to have severe health effects, including respiratory and cardiovascular symptoms; higher rates of dementia, cancer and other serious disease; and premature death. Other studies have found that toxic smoke from building structures can travel more than 150 miles. For more details and citations see the Center's May 29, 2025 comment letter and Section D: Wildfires in the Wildland Urban Interface Harm People and Wildlife. The RFPSEIR fails to adequately assess the Project's impacts to wildfire risk and the impacts of ignition to air quality and human health.

D. Wildfires in the Wildland Urban Interface Harm People and Wildlife

The RPFSEIR must consider that when wildfires burn through communities, they threaten homes, livelihoods, lives, and health. In addition to the immediate impacts of lives and homes lost, evacuations and displacement, impacts from air pollution, soil contamination, lost jobs, and the trauma of escape and recovery extend well beyond the fire footprint and last long after the fire is extinguished. Impacts to wildlife are also potentially long-lasting. The RPFSEIR downplays and dismisses the serious and cascading consequences of more wildfire in the WUI and continues to lack adequate wildfire analyses and mitigation.

i. Wildfire Impacts Disproportionately Affect Low-income, Minority Communities

Impacts of wildfire disproportionately affect vulnerable communities with less adaptive capacity to respond to and recover from hazards like wildfire. Low-income and minority communities, especially Native American, Black, Latinx, and Southeast Asian communities, are the most marginalized groups when wildfires occur (Davies et al., 2018).

Those in at-risk populations (*e.g.,* low-income, elderly, disabled, non-English-speaking, unhoused) often have limited resources for disaster planning and preparedness (Richards, 2019). Vulnerable groups also have fewer resources to have cars to evacuate, buy fire insurance,

implement fire-resilient retrofits, maintain defensible space around their homes, or rebuild, and they have less access to disaster relief during recovery (Davis, 2018; Fothergill & Peak, 2004; Harnett, 2018; Morris, 2018; Ong, Pech, Frasure, et al., 2025; Richards, 2019; Vives & Castillo, 2025). And survivors are left without resources to cope with the death of loved ones, physical injuries and emotional trauma from the chaos that wildfires have inflicted on their communities.

Emergency services often miss at-risk individuals when disasters happen because of limited capacity or language constraints (Richards, 2019). This was the case for both the Palisades and Eaton fires. Many elderly and disabled community members unable to evacuate on their own were left stranded as the wildfires advanced, and the median age of those who died in the fires was 77 (Ellis, 2025; Jarvie et al., 2025). Meanwhile, delayed evacuation alerts and limited fire trucks in western Altadena, a predominantly Black and Latino neighborhood, resulted in 18 of the 19 deaths from the wildfire (Castleman, 2025; Ellis & Greene, 2025; Toohey & Jarvie, 2025).

In the aftermath of wildfires and other environmental disasters, news stories have repeatedly documented the lack of multilingual evacuation warnings leaving non-English speakers in danger (Axelrod, 2017; Banse, 2018; Gerety, 2015; Ong, Pech, Ong, et al., 2025; Richards, 2019). This was exemplified during the Eaton and Palisades fires; evacuation alerts were only sent in English and Spanish, leaving more than 12,000 Asian Americans with limited English proficiency in the evacuation zones without potentially life-saving information (Ong, Pech, Ong, et al., 2025).

Health impacts from wildfires can have both acute and long-term health effects that disproportionately affect vulnerable populations, like children, the elderly, pregnant women and fetuses, those with underlying chronic disease, low-income communities, and communities of color. A recent study found that wildfire smoke now accounts for up to 50% of ambient fine particle pollution ($PM_{2.5}$) in the western United States (Burke et al., 2021).

Increased exposure to fine particulates in wildfire smoke has been linked with increased hospital visits for respiratory symptoms (*e.g.*, asthma, acute bronchitis, pneumonia, or chronic obstructive pulmonary disease) and cardiovascular symptoms (*e.g.*, congestive heart failure, ischemic heart disease, and myocardial infarction) (Delfino et al., 2009; Künzli et al., 2006; Liu et al., 2015; Rappold et al., 2012; Reid et al., 2016; Viswanathan et al., 2006). It has also been linked to higher rates of dementia (B. Zhang et al., 2023; Z. Zhang et al., 2023). And experts have also found that greater exposure to wildfire smoke and excessive heat during the month before conception and the first trimester of pregnancy is linked with greater risk of both short- and long-term health problems (Evans et al., 2022; Khalili et al., 2025). Researchers estimated that between 2008 and 2018 more than 50,000 premature deaths were caused by California wildfire smoke (Connolly et al., 2024). As climate change intensifies, scientists predicted that wildfire smoke could cause approximately 700,000 excess deaths between 2025-2055 (Qiu et al., 2025).

Wildfires in the WUI can lead to other harmful public health impacts due to increased exposure to toxic contaminants from burned buildings, cars, electronics, and more. Buildings and infrastructure often contain plastic materials, heavy metals, benzene, and carcinogenic gases. These toxic chemicals pose a threat in the burn area and they can travel long distances.

During the 2018 Camp Fire that burned 19,000 structures, the smoke caused dangerously high levels of air pollution in the Sacramento Valley and Bay Area and the California Air Resources Board found that high levels of heavy metals like lead and zinc traveled more than 150 miles (CARB, 2021). And unsafe levels of lead, arsenic, and other dangerous metals have

been documented in and downwind of the Eaton and Palisades fire footprints (Champlin, 2025; Smith & Briscoe, 2025).

Families living or working in or near the burn area also risk increased exposure to hazardous chemicals. After the Eaton Fire, some families with no other options returned to live in homes deemed "uninhabitable" by insurance companies, surrounded by toxic debris (Vives & Castillo, 2025). Almost 50% of schools where students had returned to in the Pasadena Unified School District had elevated levels of lead and arsenic in their soils due to toxic ash, which can have damaging effects on the nervous system, cardiovascular system, and kidneys (Haggerty & Briscoe, 2025). And farmworkers often have to continue working while fires burn and pollutants fill the air, or risk not getting paid (Herrera, 2018; Kardas-Nelson et al., 2020; Parshley, 2018). Wildfire victims have also had to deal with lack of funding and support for cleanup as well as improper cleanup, "adding to the trauma" they have already endured (Briscoe, 2025; Briscoe et al., 2025).

Service workers also face increased risk. Firefighters are suffering disproportionately high rates of cancer and other serious diseases (Dreier, 2025; Hwang et al., 2023; Johnson & Lam, 2023) as well as mental health issues due to extended fire seasons and working extended shifts away from their families (Ashton et al., 2018; Bransford et al., 2018; Del Real & Kang, 2018; Greene, 2018; Gutierrez, 2018; Simon, 2018). And firefighters who fought blazes in the LA wildfires had high levels of lead and mercury in their blood, (Hernandez, 2025). Fire cleanup workers also risk increased exposure to harmful chemicals; they often do not use appropriate protective gear as they remove toxic debris from the burn area (Haggerty, 2025).

Scientists are continuing to uncover the devastating health impacts of wildfires in the WUI. In a study that included more than 1,100 participants that were affected by the 2023 wildfires in Maui, Hawai'i, researchers found that six to 14 months after the wildfires more than 20% of participants had reduced lung function and almost 50% had clinical symptoms of depression (Juarez et al., 2025). The majority of participants reported food insecurity, economic hardship, and displacement due to the wildfires (Juarez et al., 2025), and in the month of the wildfires, the suicide and overdose rate doubled (Purtle et al., 2025). Other experts attributed more than 400 additional deaths to the LA wildfires, likely due to poor air quality, delays in health care, and other factors (Paglino et al., 2025).

Science unequivocally shows that California wildfires in the WUI are increasing negative health impacts within and beyond their footprint. Proper analyses and mitigation of the Project's impacts on wildfire ignition, wildfire spread, and the negative health impacts associated with wildfire are needed. The RPFSEIR fails to accomplish this and is dangerously deficient.

ii. Wildfires in the WUI Threaten Vulnerable Wildlife

Wildfires are a natural and necessary process in many of California's ecosystems, and many areas need beneficial fire to restore ecosystem health and cultural connection to the land. However, the last decade of unprecedented wildfires in the wildland urban interface ("WUI") are pushing fragmented populations of sensitive species to the brink. Wildlife, including genetically isolated mountain lions, remnant populations of frogs and fish, resident and migratory birds, nearby marine life, and more are all vulnerable to direct and indirect impacts from wildfire. They can suffer burns, smoke-induced asphyxiation, heat stress, traumatic injuries, and death (Garcês & Pires, 2023).

For example, two mountain lion deaths in the Santa Monica Mountains were attributed to the 2018 Woolsey Fire. Although mountain lions are highly mobile and generally able to move away from wildfires, these lions were unable to escape to safety because they were boxed in by roads and development. In addition, researchers found that after a large wildfire in an urbanized region, mountain lions avoided burn areas and increased risky behavior that could lead to more conflict with people, increased mortality, and extinction risk (Blakey et al., 2022). Such deaths can further destabilize small mountain lion populations that are already facing numerous other threats, including low genetic diversity, vehicle strikes and rodenticide poisoning, and make them more vulnerable to local extinction (Benson et al., 2016, 2019).

Smoke inhalation from wildfires can lead to negative health effects, like carbon monoxide poisoning, damage to lung tissue, and weakened immune response, in both terrestrial and aquatic wildlife (Sanderfoot et al., 2021). Smoke exposure can also cause shifts in animal behavior and stress levels, which could influence short- and long-term health and survival (Sanderfoot et al., 2021). One study found that increased smoke exposure led to decreased body condition (i.e., lower body mass) of wild birds in California, which suggests that they expend more energy while coping with sub-lethal health effects of smoke exposure (Nihei et al., 2024).

Heavy rains after wildfire can trigger landslides and debris flows that threaten small populations of sensitive, less mobile species that have been diminished due to habitat loss and fragmentation from sprawl development, dams, disease, non-native predators, and other threats. After the 2020 Bobcat Fire, biologists were desperate to rescue remnant populations of yellow-legged frogs, Santa Ana suckers, unarmored threespine stickleback fish, speckled dace, arroyo chub and arroyo chub because they were concerned that post-fire debris flows due to winter rains would wipe out their populations in the fire zone (Sahagun, 2020). Biologists conducted similar rescue missions for the last-known populations of Southern California steelhead and northern tidewater gobies in the Santa Monica Mountains after the 2025 Palisades Fire (Seidman, 2025a, 2025b, 2025c).

Historically, these species would have been able to recolonize from neighboring populations after the loss of individuals or populations to fire impacts. Unfortunately, that ability is now limited by the species' currently small and fragmented population structure. Continued alteration of historical fire regimes due to sprawl development will further endanger remnant populations.

Devastation caused by wildfire in the WUI is far-reaching and long-lasting. We have yet to uncover the full extent of harm such wildfires due to wildlife and the habitats they rely on, but it is certain that careless land use planning and policy are causing death and destruction in the natural world. The RPFSEIR fails to adequately assess and mitigate the Project's impacts on wildfire risk and how increased ignitions will impact biological resources.

iii. The RPFSEIR fails to consider mitigation related to wildlife insurance for new residents and owners.

California is facing an insurance crisis. Many private insurers are leaving California or otherwise refusing to insure homes built in the wildland-urban interface (like the Proposed Project), and this has resulted in an addition of approximately one half of a *trillion* dollars of added assets being "covered" under California's FAIR Plan, which was designed to be a wildfire insurance of last resort for homeowners otherwise unable to obtain coverage (and is owned and managed by the State) (Saleh, 2025). In turn, this has caused a major uptick in premiums on the

State's FAIR Plan, which has led some homeowners to forego wildfire insurance altogether. (*Id*.) And many of the homeowners that have been able to retain private wildfire insurance have been unable to actually be reimbursed through their insurers' claims process (Overland, 2025 [discussing litigation filed by victims of the recent fires in Los Angeles against their insurer for failing to pay out valid claims resulting from those fires]).

The RPFSEIR should therefore analyze whether the residences contemplated will be insurable through private insurers or will require access to the California FAIR Plan and what each home's premium ought to be. (*Laurel Heights Improvement Assn.,* 47 Cal. 3d at 392.) In undertaking that analysis, the Project proponent must also take into account that many private insurers have a documented practice of underinsuring homes when contracting for wildfire insurance, and that this practice of underinsurance has resulted in many homeowners receiving far less than their home's worth from their insurer after their homes are destroyed by wildfire (Neilson, 2025). Moreover, the RPFSEIR should include a mitigation measure requiring the Project proponent to financially cover the wildfire insurance for the homes being sold or otherwise disclose accurate and helpful information regarding the availability of private or public wildfire insurance, the costs thereof, and the risks inherent in obtaining such insurance and, more importantly, in foregoing to do so when advertising and selling the residences contemplated under the Proposed Project and Specific Plan. (14 C.C.R. § 15021(a).) In fact, the State is working on preparing and publishing a tool that would help facilitate that process (Rahim, 2025).

IV. The County's Environmental Review of the Project's Significant Transportation Impacts Is Deficient.

This Project will increase regional vehicle miles traveled ("VMT'') by more than *one hundred million miles* each year, running against California's goals to reduce car-based lifestyles, vehicle accidents, greenhouse gas emissions, and air pollution. By building in the wildland urban interface far from existing services, this Project will entrench automobile dependence for the Project's residents for decades to come. The impacts from this enormous increase in car travel are significant and must be mitigated as such.

Providing alternatives to single occupancy vehicle travel is essential to building an efficient, sustainable and equitable transportation system. Unfortunately, the U.S. is far from achieving a multi-modal transit system, and projects like this move California even further from that target. In 2013, one study found that 76.4% of U.S. daily commutes were people driving alone (McKenzie, 2015). According to the EPA, the collective daily transportation in the U.S. constitutes about 27% of the total greenhouse gasses released (U.S. Environmental Protection Agency, 2017). California's annual average emissions associated with passenger vehicles between 2000 and 2020 was approximately 110 million metric tons of CO2 equivalent, or 25% of the state's total emissions. (CARB, 2022).

Increasing a region's VMTs isn't just bad planning, it also undermines community health. Increasing VMT increases emissions of air pollutants such as nitrogen oxides (NO_x), volatile organic compounds (VOCs), carbon monoxide, heavy metals, carbon dioxide and respirable particulate matter ($PM_{2.5}$). Increasing VMT also leads to more ozone (O_3) production through the photochemical reactions of NO_x and VOCs emitted by vehicles. (Fu et al., 2021). Short- and long-term exposure to several of these pollutants has been linked to premature mortality, compromised birth outcomes, heart disease and a host of respiratory illnesses (Mujtaba & Shahzad, 2021).

Another serious direct impact of increasing the number of cars on roads, like the Project would do, is automobile crashes, which have historically been the leading cause of death among adolescents in the United States. (Goldstick et al., 2022 [showing vehicle crash as the top cause of death from 1999 to 2019, when firearm deaths narrowly surpassed vehicle deaths]). An estimated 42,915 people in the U.S. died in car crashes in 2021 alone and 3.4 million people are injured each year, which costs an estimated $473.2 billion annually as measured by wage and productivity losses, medical expenses, motor-vehicle damage, and employers' uninsured costs (Frumkin et al., 2004; U.S. Department of Transportation, 2022). The rate of deaths due to traffic has been increasing since 2013. (National Safety Council, 2026)

Beyond the direct impacts, increased VMT has long term impacts on commuters. In 2019, the duration of the average daily commute in the United States increased to a new high of 55.2 minutes, and a record 9.8 percent of commuters reported daily commutes of at least 2 hours (Burd et al., 2021). These long commutes reduce the amount of time that workers are available to spend with family, friends, and community. The increase in inactivity and isolation can also lead to long-term health complications such as pre-diabetes, diabetes, obesity, asthma, isolation, stress and depression (Ewing et al., 2003; Leyden, 2003). In contrast, developments that facilitate commuting my mass transit, foot, or bicycle increase people's overall activity level and health. (Sahlqvist et al., 2012).

Given the myriad public health problems associated with increased car dependance, it should be a priority of the County to reduce VMT with every new project, especially for projects as large as this. The County needs to continue investing—and requiring project applicants to invest—in alternative modes of transportation to not only make multi-modal transit cheaper, quicker, and easier than passenger vehicle transit. Best practices for transportation options should include providing free public transit services for future residents and workers; implementing bus only lanes; optimizing bus routes to minimize overlap and ensure coverage across the city in line with demand; and providing high-frequency, reliable services with regular bus stops for easy access.

Studies indicate that free public transit services typically result in ridership increase from 20% to 60% in a matter of just a few months (Studenmund and Connor, 1982). Similarly, bus lanes that reduce total transit door-to-door travel times by 5%-15% will increase urban peak ridership 2%-9% (UCLA Institute of Transportation Studies, 2019). Lastly, ensuring accessibility and convenience is essential to increasing ridership. Providing more bus stops decreases the distance residents have to travel to access such services.

Instead of pursuing these common-sense solutions, this Project envisions continuing California's failed experiment of building car-centered infrastructure by creating a sprawling, low density, mass transit desert far from any existing services. This will result in the Project's residents being tethered to their cars for their every need for decades to come. The VMT analysis shows that the Project will induce over 100 million miles travelled per year. (RPFSEIR Appx. C-1 at 9.) This dramatic amount of automobile travel will result in an average of 1.38 of the Project's residents to die each year in vehicle accidents. (National Safety Council, 2026 [showing a death rate of 1.38 people per 100 million miles travelled].) Vehicle travel resulting from the Project will also emit 53,873 tons of CO_2 per year, 220 pounds of Nox per day, 657 pounds of carbon monoxide per day, and 237 pounds of particulate matter 10 per day. (Draft SEIR at 5.1-34, 5.7-26.) This Project will steer region in the opposite direction of local, county, and state policy, eroding community and environmental health to build yet more car-dependent infrastructure.

The RPFSEIR fails to adequately assess and mitigate the VMT, GHG, air pollution impacts from the massive increase in car travel that will be caused by this Project.

A. The RPFSEIR'S VMT Analysis is Unsupported and Deficient

The County argues that this Project, which will add one hundred million VMT to the area's roadways each year, does not have a significant traffic impact. The Project's enormous VMT impacts are significant when compared to the County-established threshold. Yet instead of using its established threshold, the County instead used an inapposite environmental baseline and threshold of significance to preclude a finding of significance. These findings are not supported by substantial evidence. The County must recirculate the EIR to explain how it will mitigate its significant impacts to VMT.

i. The County Was Required to Perform a VMT Analysis in the RPFSEIR

Senate Bill 743, passed in 2013, amended CEQA to require lead agencies to replace the outdated level of service traffic metric with VMT. (See Guidelines § 15064.3). The level of service analysis focused on how a project would impact road congestion, a metric that does not factor in GHG emissions or air pollution. The purpose of SB 743 was to amend CEQA to be more "able to promote the state's goals of reducing greenhouse gas emissions and traffic-related air pollution, [while] promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations." (Steinberg, 2013). In other words, SB 743 aligns CEQA with California's climate goals by focusing the traffic analysis on how much a project will impact automobile use, rather than how a project will impact road congestion.

Though Senate Bill 743 was passed after the 1992 development was approved, CEQA requires the County to replace its outdated level of service analysis with a VMT analysis. CEQA Guidelines section 15007(b) states that "new requirements in amendments will apply to steps in the CEQA process not yet undertaken by the date when agencies must comply." This step in the CEQA process—the Revised Partial SEIR—could not have begun before the final judgment granting the Center's writ of mandate was filed by the Los Angeles County clerk. This filing occurred on February 1, 2021, well after the new VMT requirement took effect on July 1, 2020. (See Guideline § 15064.3.) As such, the VMT CEQA Guidelines apply to this RPFSEIR, and the County was required to redo its 1992 traffic analysis.

The County recognized this requirement and prepared a Transportation Analysis because the "level or service metric . . . is no longer the applicable metric for identifying significant impacts under CEQA." (RPFSEIR Appx C-1 at p. 1.) While the County appropriately decided to conduct this analysis, the analysis and its attendant findings were deficient.

ii. The Environmental Baseline Used in the VMT Analysis is Unsupported

The new traffic analysis found that VMT impacts were not significant. The County's conclusion is flawed for two reasons. First, the appropriate environmental baseline is the existing, undeveloped baseline. Instead, the Conty used the hypothetical baseline of the 1992 project at full buildout. Second, the threshold of significance chosen by the County is not supported by substantial evidence.

The County used the 1992 project and its 12,585 hypothetical residents as the environmental baseline, rather than the actual baseline, which is no residents. The County's

attempt to obfuscate the significance of the Project's VMT impacts by inflating the environmental baseline violates CEQA. As evidenced thoroughly in the Center's May 29 letter, a foundational aspect of CEQA is to treat the *existing* environment as the baseline. The County provided no rebuttal to the abundant evidence provided by the Center, failing to cite a single case, provision of the Public Resources Code, CEQA Guideline, or County policy. Instead, the County relies on unsupported assertions that the previous project, which was never built, was not hypothetical.

Though the development had been approved in 1992, that approval does not constitute an acceptable baseline. The CEQA Guidelines and Supreme Court speak directly to this set of facts, detailing that permitted conditions are not the same as a CEQA baseline. The Guidelines detail that "an existing conditions baseline shall not include hypothetical conditions, *such as those that might be allowed, but have never actually occurred*." (Guidelines § 15125(a)(3) [emphasis added].) The Supreme Court has held that "a long line of Court of Appeal decisions holds, in similar terms, that the impacts of a proposed project are ordinarily to be compared to the actual environmental conditions existing at the time of CEQA analysis, *rather than to allowable conditions defined by a plan* or regulatory framework." (*Communities for a Better Environment v. South Coast Air Quality Management Dist.*, 48 Cal. 4th 310, 320-321 [emphasis added].) Though the 34-year-old development approval set some "allowable conditions," those conditions never came to fruition. The "actual environmental conditions existing at the time of" this RPFSEIR are undeveloped land with no residences and minimal business activity. The environmental baseline must be set based on this reality, not the hypothetical project.

Using this appropriate, existing environmental baseline would undeniably lead to a finding of significance because the Project would add 275,141 VMT to the region each day compared to the negligible existing VMT associated with the Project area.

As described in the next subsection, even if the Project uses the generous Southern California Association of Governments environmental baseline of 22.3 VMT per capita, the Project will nonetheless result in significant VMT impacts.

iii. The VMT Significance Threshold Used by the County is Unsupported

The appropriate threshold of significance of 18.5 VMT per capita has already been established by the County, yet the County failed to use this threshold for the Project.

Los Angeles County prepared a SB 743 Implementation and CEQA Updates Report ("County Guidance") in 2020 to help guide agencies through Senate Bill 743 VMT analyses for the purposes of CEQA review. This County Guidance sets the baseline VMT for North Los Angeles County, where the Project is located, for a residential project at 22.3 VMT per capita. (Los Angeles County, 2020, pp. 16, 30). The County Guidance sets the VMT significance threshold at 16.8% below this baseline. (Los Angeles County, 2020, pp. 16, 29). In this case, a 16.8% reduction from the 22.3 VMT per capita equals 18.5 VMT per capita. (Los Angeles County Public Works, 2020, p. 11).

The significance threshold of 18.5 VMT per capita is dramatically lower than the Project's 25.7 VMT per capita. (RPFSEIR Appx. C-1 at 9.) Since the per capita VMT will greatly exceed the County-established significance threshold for residential projects, the VMT impacts from the Project are significant and must be analyzed and mitigated as such.

Instead of using the County's own guidance for residential projects, the County declares that any decrease in VMT per *service population* compared to the 1992 project automatically

results in insignificance. (RPFSEIR Appx. C-1 at p. 7.) As described in the County Guidance, VMT per service population is the correct metric only when a project is *not* a residential or office project. (SB 743 Implementation Report, 2020, p. 30). This is because VMT per service population is intended to include the VMT from both a development's residents and employees commuting to "service" the development's businesses. As such, the baseline for VMT per service population is higher than per capita because it includes these worker trips from outside the development.

Where, as here, a development has no businesses, this metric does not make sense. This Project is almost entirely residential, with only 22.9 acres of the 1329.7 acre Project zoned as commercial or industrial. (PRFSEIR at Ex. 1). Non-residential VMT makes up just 3.2% of the Project's overall VMT. (RPFSEIR Appx C-1 at 4 [showing commercial retail VMT at 3,670, recreation/park VMT at 2,640, and school VMT at 2,640].)

The County argues that the Project's impacts are not significant because VMT per service population decreased from 27 to 25.7 for the 1992 development compared to the 2018 Project. Yet the correct metric is VMT per capita, which is the exact same for both projects. The RPFSEIR must redo its analysis using this per capita metric rather than the unsupported per service population metric.

iv. The Traffic Analysis's VMT Per Capita is Flawed

Beyond using an unsupported environmental baseline and significance threshold, the entire VMT analysis understates the amount of driving that the Project will cause. As noted in footnote 2 of the VMT and Service Population Calculation Worksheet, the only trips used in the analysis include "2 trips per employee (26.4 VMT per employee/2 trips per employee =13.2 miles." (RPFSEIR Appx C-1 at 9.) This meager VMT accounting ignores that the Project will require residents to drive to fulfill all their daily needs, not just to get to work. Unaccounted for are trips to the grocery store, to drop kids off at school, to medical appointments, to restaurants, to cultural and social events, and more. And since this Project sprawls into undeveloped lands without existing services, residents would need to travel miles to existing urban centers to fulfill these needs. If these unaccounted for trips were included in the VMT analysis, the overall VMT would no doubt be substantially higher As such, the VMT analysis is not supported by substantial evidence.

v. The RPFSEIR Fails to Incorporate All Feasible Measures to Mitigate VMT Impacts

Since the Project's VMT impacts are significant, the County must implement all feasible mitigation measures. The RPFSEIR fails to do so, requiring no mitigation for VMT. Even if the County succeeded in implementing the Project's "features that tend to reduce VMT" (which are not enforceable mitigation measures), the Project would still greatly exceed the VMT significance threshold. These features include building bike infrastructure (VMT reduction of 0.08%), expanding the transit network (4.6%), affordable housing (2.4%)[4], and pedestrian network (6.4%). Together, this would decrease VMT per capita by 13.4%, or 22.3 VMT per capita. This is number is still 20% higher than the significance threshold of 18.5 VMT per capita.

[4] This reduction is based on a 28.6% decrease for the Project's 315 affordable units, assuming those units are multiple family residential units with an average of 2.79 inhabitants. (RPFSEIR Appx C-1 at 9.)

Since the VMT would remain far above the significance threshold under any circumstance contemplated by the RPFSEIR, the County must consider all feasible measures to mitigate the Project's VMT impacts. Some of the short-term measures identified by the County in its guidance document, but not included in the RPFSEIR, include implementing a commute trip reduction program, providing ride-sharing programs, implementing subsidized or discounted transit programs, encouraging telecommuting and alternative work schedules, unbundling parking costs from property costs, implementing market price public on-street parking, providing traffic calming measures, and implementing car-sharing programs. (Los Angeles County, 2020, p. 34). The County guidance also identified two long-term mitigation measures, neither of which were contemplated by the Project. These measures include a VMT mitigation exchange and a VMT mitigation bank. (Los Angeles County, 2020, p. 36). The County must adopt enough of these additional, feasible mitigation measures to reduce the VMT per capita below the threshold of significance.

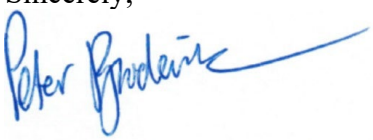
A decades-old EIR that fails to even calculate VMT is not sufficient to satisfy CEQA's requirements; the appropriate inquiry is "whether a proposed project or plan adequately reduces total VMT." (Los Angeles County Public Works, 2020). This Project clearly does not.

V. Conclusion

The Center appreciates the Commission's consideration of these comments. Because the environmental review for the Project is inadequate for the foregoing reasons, the Center urges the Commission not to approve the Project unless and until these deficiencies are remedied.

Given the possibility that the Center will be required to pursue legal remedies in order to ensure that the County complies with its legal obligations including those arising under CEQA, we would like to remind the County of its statutory duty to maintain and preserve all documents and communications that may constitute part of the "administrative record" of this proceeding. (Pub. Res. Code § 21167.6(e); *Golden Door Properties, LLC v. Superior Court* (2020) 53 Cal.App.5th 733.) Please include this letter and the provided references in the County's file for this Project, and continue to include the Center on the notice list for this Project using the contact information below.

Sincerely,



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Zhang, B., Weuve, J., Langa, K. M., D'Souza, J., Szpiro, A., Faul, J., Mendes De Leon, C., Gao, J., Kaufman, J. D., Sheppard, L., Lee, J., Kobayashi, L. C., Hirth, R., & Adar, S. D. (2023). Comparison of Particulate Air Pollution From Different Emission Sources and Incident Dementia in the US. *JAMA Internal Medicine*.
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Exhibit A

Declaration of Chad Christensen

I, Chad Christensen, hereby declare as follows:

1. The facts set forth in this declaration are based on my personal knowledge. If called as a witness, I could and would testify competently to these facts. As to those matters which reflect an opinion, they reflect my personal opinion and judgment on the matter.

2. I am the Deputy Chief of Natural Resources and Planning for the Mountains Recreation and Conservation Authority (MRCA) and have been in this position since April 2020. Previously I was a Project Analyst hired in February 2017.

3. Attached are true and correct copies of photos taken on November 5, 2020 approximately between 2:49 a.m. and 2:59 a.m. of a mountain lion crossing from the east side of the southbound direction of the separated I-5 freeway from Grasshopper Canyon and westerly into the Marple Canyon. The single-lane box culvert for the Marple Canyon access road that crosses under this southbound section of I-5 is identified as "Tunnel 2" and "Underpass 2" in Santa Monica Mountains Conservancy's April 17, 2018 letter on the Northlake Project (AR010051-59). Underpass 2 is one of two freeway crossing structures along a ten-mile section of I-5 between Templin Highway and Castaic Creek. The MRCA owns 245 acres of Marple Canyon west of Underpass 2 between the separated north-/southbound sections of I-5 and six acres east of Underpass 2 that connect with Grasshopper Canyon.

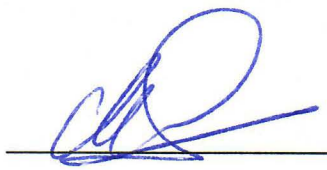
4. These photos were taken by a wildlife camera that I placed on MRCA conservation lands on June 9, 2020 in my official capacity as Deputy Chief of Natural Resources and Planning and as Project Manager for the MRCA's Marple Canyon I-5 Wildlife Crossing Enhancement Project (Project).

5. The Project was awarded Wildlife Conservation Board (WCB) funding in 2020 to enhance 2.75 acres of habitat on the west and east approaches to Underpass 2 in order to promote wildlife movement between Marple and Grasshopper Canyons. On March 27, 2020, I received a Caltrans Encroachment Permit No. 07-20-N-SV-0894 to install the wildlife cameras within the freeway right-of-way as an MRCA in-kind contribution towards the Project. The

Project Area and Underpass 2 are part of the South Coast Wildland's *Castaic – Sierra Madre Connection.*

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 15th of December 2020,



Chad Christensen

Ventura, California


28.32 inHg - 68°F 11/05/2020 02:49AM MARPLE1


28.32 inHg - 68°F 11/05/2020 02:49AM MARPLE1


28.32 inHg - 68°F 11/05/2020 02:49AM MARPLE1


28.38 inHg - 73°F 11/05/2020 02:59AM MARPLE2


28.38 inHg - 73°F 11/05/2020 02:59AM MARPLE2


28.38 inHg - 73°F 11/05/2020 02:59AM MARPLE2

Exhibit B

SANTA MONICA MOUNTAINS CONSERVANCY
RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207
WWW.SMMC.CA.GOV

April 17, 2018

Regional Planning Commission
Department of Regional Planning
Los Angeles County Hall of Records, Room 1348
320 W. Temple Stree
Los Angeles, California 90012

Via Electronic Mail

North Lake Project
Final Supplemental Environmental Impact Report Comments
R2015-00408-(5) - SCH No. 2015031080 - VTT No. TR 073336

Dear Planning Commissioners:

The Santa Monica Mountains Conservancy (Conservancy) urges the Regional Planning Commission at a minimum to not certify the Final Supplemental Environmental Impact Report and require a re-circulation to address major deficiencies in the record including an inadequate range of alternatives. More decisively we urge the Commission to deny the North Lake project for the following ubiquitous and compelling reasons.

The huge myth and erroneous smoke screen that staff and the developer are putting before your Commission is that the 1992 North Lake Specific Plan guarantees the developer substantial immutable development rights. That Plan is a devastating early 1990's dinosaur document that does not have the foundation of a Environmental Impact Report representing either current physical conditions and standards beneath it. For all intents and purposes, this project is starting at close to square one in regards to environmental review. There is an attempt to lure the Commission into myopically believing differently and thus force perhaps the most ill suited land use in the County's history -- a land use that provides no general public benefit (except for tract residents) and heaps of permanent public detriment for the whole County. The Commission must, and legally can, look at this property as a fresh slate in regards to environmental review and thus project design. The developer common cry that,"We made it better than the prior project" does nothing to substantively solve huge unmitigable environmental issues with the project.

The FSEIR was intentionally crafted to exclude any Alternative projects for your consideration that provide even a slightly better public outcome on everything from traffic to degradation of public lands to regional wildlife habitat connectivity. That is an insult and

slight to the Commission and the people of Los Angeles County. The project grading footprint of every FSEIR alternative is the same with tens of millions of cubic yards of earth filling Grasshopper Canyon and scraping its walls bare. What fallacy that the project would not be blatantly visible with a fully improved miles of street-lit Ridge Route, a ridgeline commercial complex, and over a thousand dwelling units and street lights glowing above the Santa Clarita Valley surrounded by natural darkness.

Only a misguided decision-making body would approve a project that unnecessarily extends suburban residential development over three miles into an area jacketed by public National Forest lands, Bureau of Land Management property, and high public visitation-State-owned-Castaic Lake Recreation Area. Through what mechanism is the County providing its now public land to facilitate this development? Is the developer paying the County?

Nobody would benefit from this project in either the short or long run other than the developer and maybe the few vocal small businesses at the base of the grade. Do you destroy a whole remote canyon next to a cherished recreation area and exacerbate an existing traffic nightmare just to benefit future totally unknown homeowners in area that has a glut of approved unbuilt development? Luxury housing available at best three years from now at the maximum possible distance from the City of Los Angeles does not address address home afford ability.

Only a poorly informed decision-making body would fall into the trap of burying 3.5 miles of blueline stream that flow into Castaic Lagoon used for swimming to create expensive housing in the Santa Clarita Valley where there are tens of thousands of unbuilt approved housing units.

There is no combined set of needs for this project that outweigh the massive amount of unmitigated adverse environmental impacts. The benefits in the Statement of Overriding Considerations (SOC) are all unsupported with data or common sense. However, the regionally significant project detriments are patently clear in every arena of environmental impact.

The County published a April 5, 2018 Supplemental Memo that disclosed that revisions to the Project were made which removed virtually all of the proposed commercial and industrial uses in favor of more dwelling units. Such revisions effect various EIR technical analyses that now do not reflect this project revision. In addition, a project description cannot be changed after a DSEIR has be circulated. The SOC claims that the project will provide for (now non-existent) industrial uses. Those claimed economic benefits no longer exist even on paper.

The applicant made an attempt to show east-west wildlife connectivity through the project connected to the two adjacent vehicle tunnels under southbound Interstate 5. Tunnel 2 in the FSEIR appendices is flanked on both sides by parkland owned by the Mountains Recreation and Conservation Authority and paid for by the owner of over one hundred acres between the south and north bound I5 lanes. Given the paucity of undercrossings for animals under the I5 from Violin Canyon to Templin Highway, no under-crossing can be dismissed as valuable to cross-freeway wildlife movement. The FSEIR fails to include a viable habitat linkage option from Tunnel 2 to protected public lands without a minimum 6,000 foot journey around either end of the proposed project. Animals can navigate 60 percent slopes for considerable lengths. The applicant dismisses the ability of animals to enter the North Lake property approximately east of Tunnel 2 because of steep terrain. The FSEIR shall remain deficient until a detailed slope study shows the terrain viability for animals to move from Tunnel 2 over the Grasshopper Canyon watershed divide to the bottom of Grasshopper Canyon. The FSEIR shall remain deficient until includes an Alternative that provides a protected direct east-west habitat linkage between Tunnel 2 and Castaic Lake Recreation Area public lands. No non-North Lake private lands can break this linkage.

The applicant will taut the value of Tunnel 3 as a superior habitat linkage. However, both sides of Tunnel 3 have multiple non-North Lake private parcels that could easily be blocked by fencing and diminish the efficacy of the tunnel. At paint ball facility is also in the way.

The FSEIR is deficient for not addressing how improvements to Ridge Route and added traffic would diminish wildlife potential to safely cross Ridge Route. The FSEIR is deficient for not addressing how a 3.5-mile-long development next to Castaic Lake Recreation Area could adversely affect human intolerant wildlife species on the land between the lake and the development.

Letters in record from the Center for Biological Diversity and the California Department of Fish and Wildlife address a plethora of FSEIR deficiencies that are herein incorporated by reference.

The FSEIR totally fails to make the case that a much less damaging project is infeasible. The project design does not avoid any environmental resources. The project does not cluster any development to create ecologically viable blocks of open space. The minimum basic unwritten standard for open space dedications of County projects is a minimum 50 percent open space dedication. This project does not even come close to that standard.

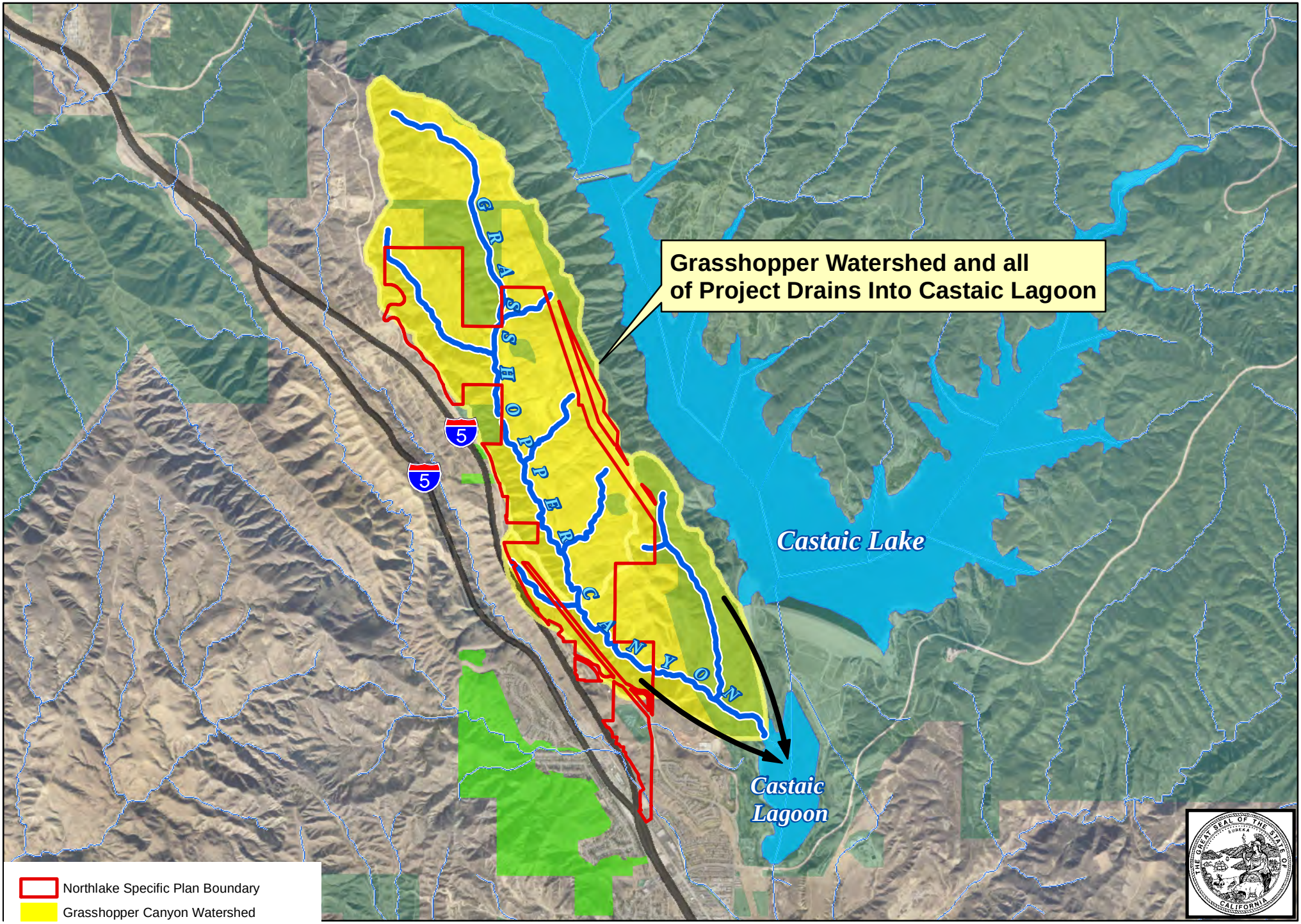
The FSEIR is deficient for not addressing why the Creek Avoidance Alternative would require exporting a minimum 10 million cubic yards of earth. Where is the demonstrated proof? The FSEIR partially rules out a creek avoidance alternative because it will require three bridges. Since when does the need for three bridges rule out the viability of a project with over 1,000 housing units? These stark omissions show the weakness of the FSEIR Alternatives selection.

The entire proposed development project footprint collects pollutants, concentrates them in artificial ponds, and then releases them into the Castaic Lagoon swimming area. How is this a public benefit? It is a huge permanent public safety threat.

The FSEIR is deficient for not addressing new standards for debris flow generated by the recent catastrophic debris flows in Montecito. The Tract Map cannot be approved because of this public safety issue. The County will develop new standards for silt and debris flow from offsite upstream properties perhaps ridgeline to ridgeline. The FSEIR does not taken into account potential additional debris flow from the "Montecito Effect."

Sincerely,

PAUL EDELMAN
Deputy Director
Natural Resources and Planning


Grasshopper Watershed and all
of Project Drains Into Castaic Lagoon
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Lagoon
Northlake Specific Plan Boundary
Grasshopper Canyon Watershed
SMMC MRCA Owned/Managed Property
Other Public Land
Project No. R2015-00408-(5)
Northlake Associates LLC
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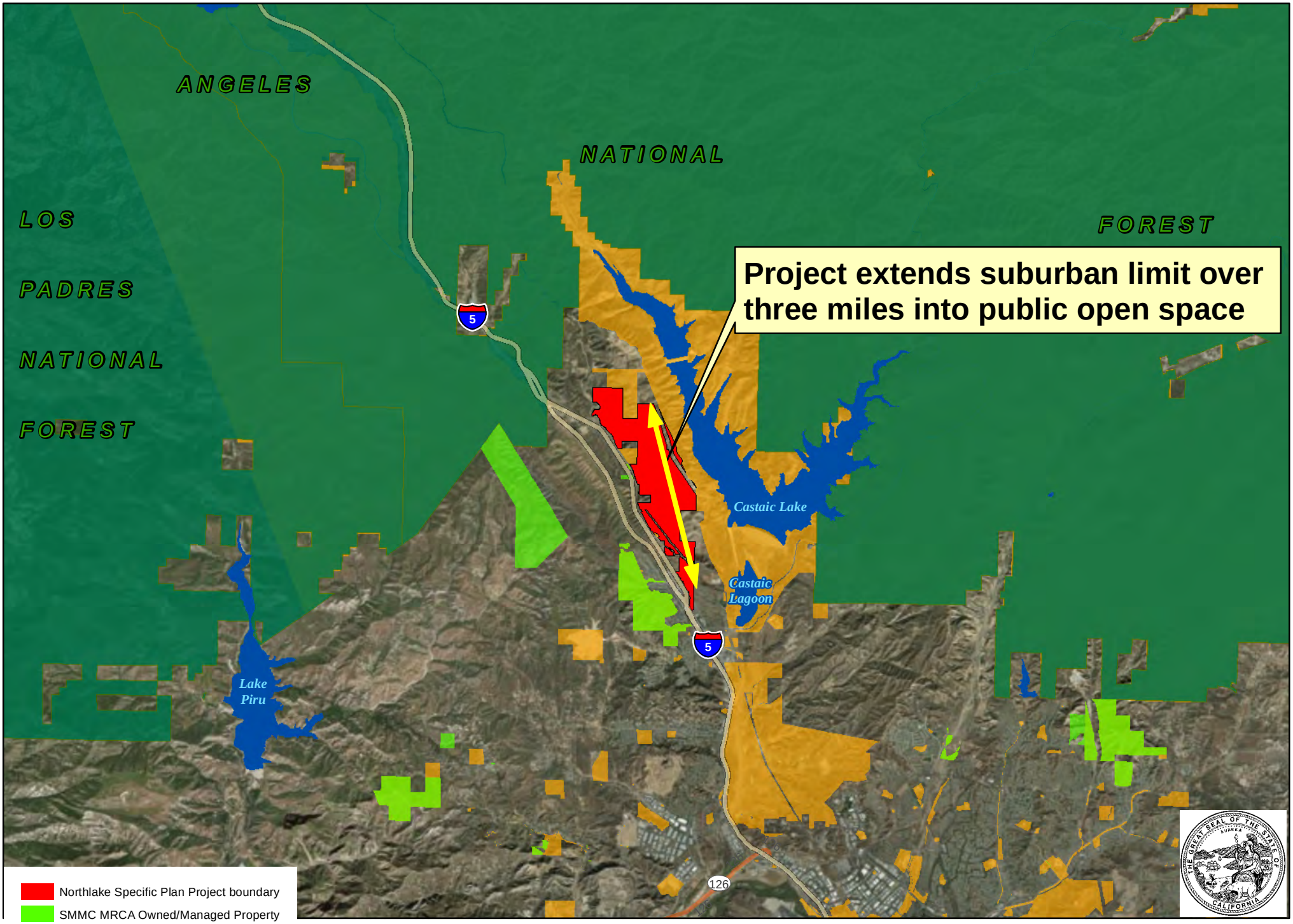
ANGELES
NATIONAL
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PADRES
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FOREST
Project extends suburban limit over three miles into public open space
Castaic Lake
Castaic Lagoon
Lake Piru
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Northlake Specific Plan Project boundary
SMMC MRCA Owned/Managed Property
Angeles/Los Padres National Forest
Other Public Land
Project No. R2015-00408-(5)
Northlake Associates LLC
4/18/2018
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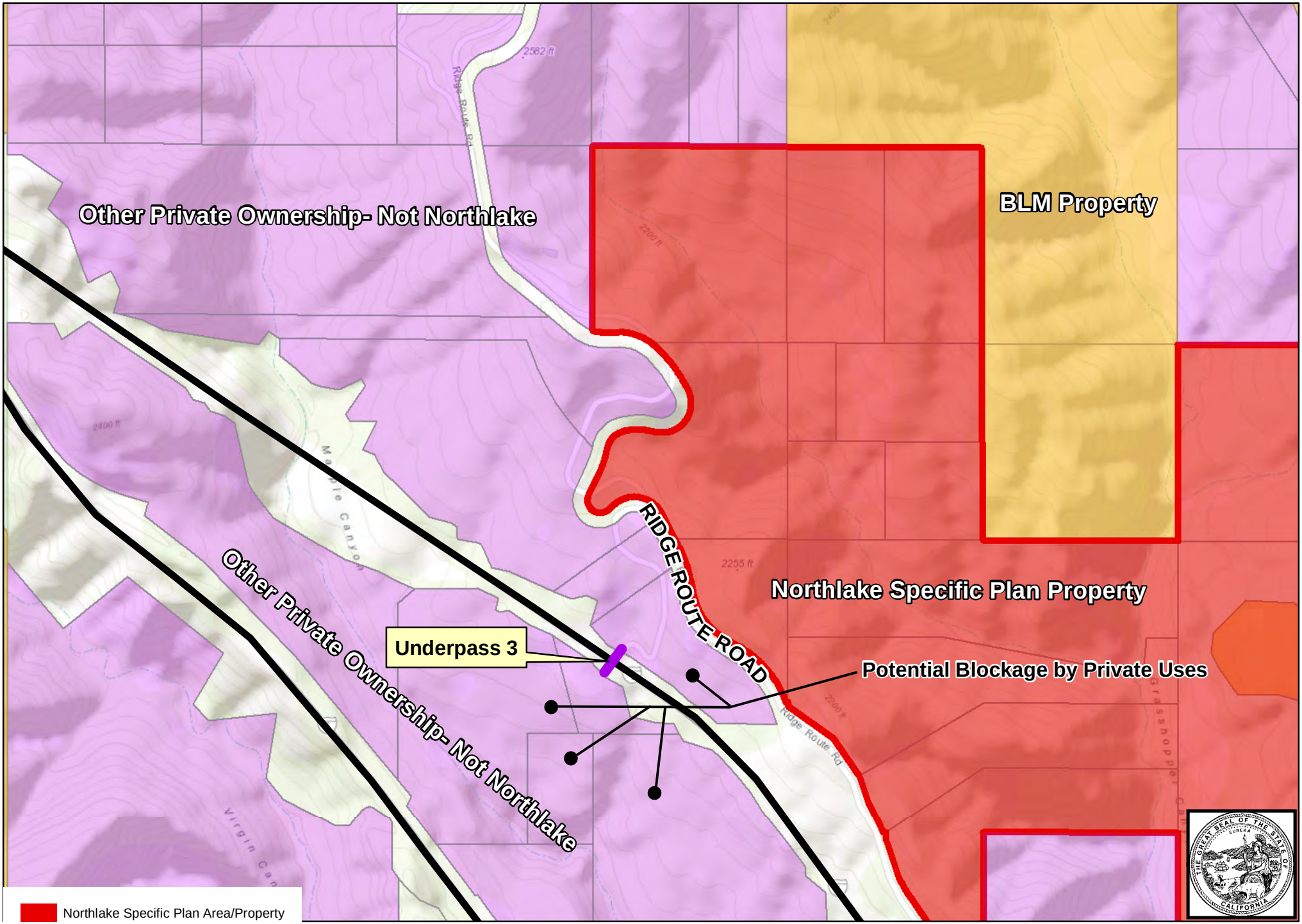

Project No. R2015-00408-(5)
Northlake Associates LLC

4/18/2018

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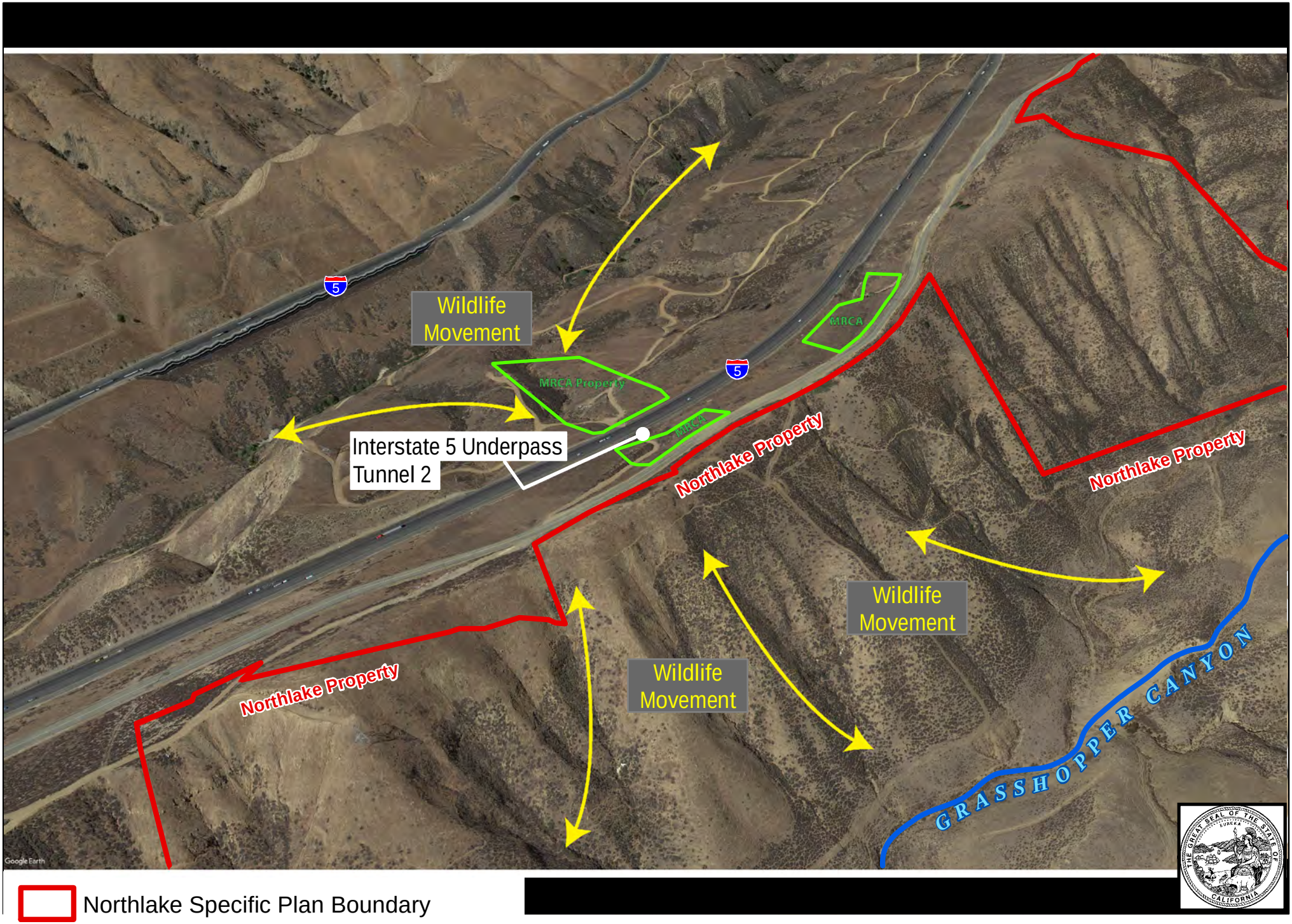


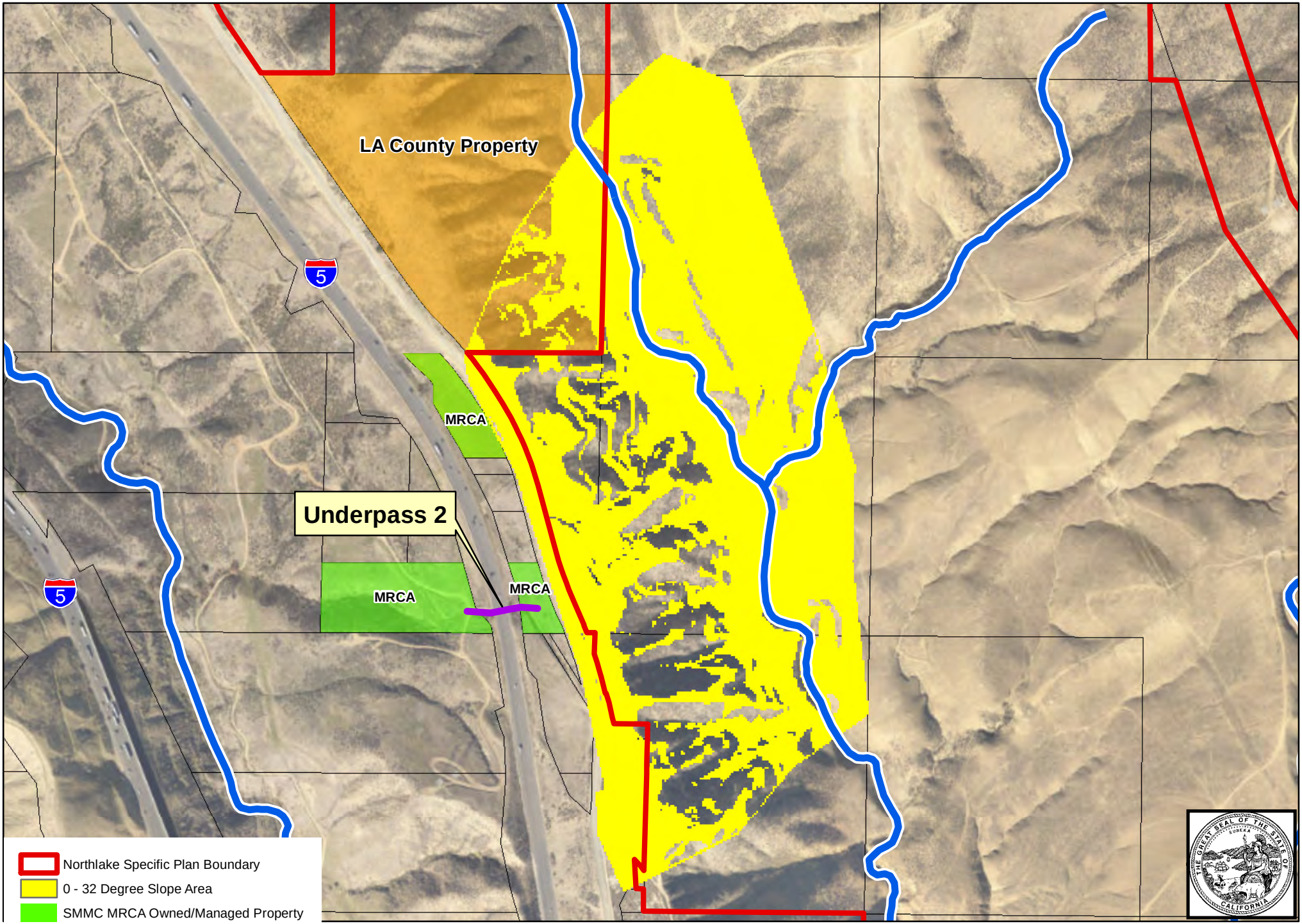
Northlake Specific Plan Boundary

SMMC MRCA Owned/Managed Property

Project No. R2015-00408-(5)
Northlake Associates LLC

4/18/2018

0 250 500 Feet



Project No. R2015-00408-(5)
Northlake Associates LLC

4/18/2018

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYTEM PROTECTION AND SUSTAINABLE LAND USE

January 23, 2026

VIA ELECTRONIC MAIL

Chair Elvin W. Moon
Regional Planning Commission
Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

RE: Item 7, NorthLake Specific Plan Project - *OPPOSITION*

Dear Chair Moon and Members of the Commission:

Endangered Habitats League (EHL) requests denial of this project. For your reference, EHL is a Southern California regional conservation group dedicated to ecosystem protection and sustainable land use. We are long-term participants in County planning initiatives, from the General Plan to the SEA Ordinance to the Climate Action Plan.

EHL is a longstanding "pro-housing" and a "smart growth" advocate. However, NorthLake abjectly fails minimum tests for acceptable land use. Regional Planning, through its Area Plan updates, has shown that all RHNA needs can be met in safe and environmentally sound locations. Sprawl from the early1990s – *backward even for that era* – is contrary to contemporary needs and should be rejected rather than re-adopted.

Biology

According to the Santa Monica Mountains Conservancy, NorthLake is a "tragedy." This is not an exaggeration as it is one of the most biologically destructive proposals in my long experience. It would pave over a blueline stream (Grasshopper Creek) which runs the length of site, a virtually unprecedented impact. If this is "necessary" as the RPFSEIR claims, then a site so full of landslides that it requires 33 million cubic yards of grading is not suitable for intensive development.

640 acres of coastal sage scrub – a huge amount - would be obliterated, including many rare plants, whose very rarity indicates specialized niche habitats that make the proposed mitigation via re-planting unlikely to succeed.

Sometimes a sprawl project will preserve a large fraction of its site in intact natural open space, arguing for its approval. This is *not* the case with NorthLake. Its limited open space consists of remnants around the development periphery, impacted by development edge effects.

Fire safety

New information requires subsequent environmental analysis as shown in comments from the Center for Biological Diversity.

Also, the County's General Plan Safety Element policies make it clear that expanding the Wildland Urban Interface (WUI) into Very High wildlife hazard with thousands of vulnerable new residents is irresponsible. This injury is compounded by the untruthfulness of the Final EIR which claims that the project – even if exempt from General Plan Policies S4.1, S4.20 and L1.10 – is "consistent" with them because it is "generally surrounded existing built development." Please look at an aerial photo of the site and then revise the Responses to Comments so that this falsehood does not compromise your Commission's integrity and make a sham of the General Plan.

Wildlife movement and mountain lion impacts

New information requires subsequent environmental analysis as shown in comments from the Center for Biological Diversity.

VMT

Distant from employment, and locked into perpetual automotive commutes and high GHG emissions, NorthLake epitomes "dumb" growth and unsustainability. Defying common sense and well-established CEQA law, the EIR uses the baseline of the old Specific Plan instead of the required "plan-to-ground" baseline of existing conditions for VMT analysis. While this may comport with Public Works direction, that does not make it proper or legal.

Alternatives

The RPDSEIR purports, based on applicant-prepared studies, that full creek avoidance is infeasible for geotechnical reasons. Has the County verified this information with an independent geologist accountable to the public? Further avoidance of Grasshopper Creek, coastal sage scrub, and rare plants may be possible.

The RPDSEIR deems the Partial Creek Avoidance Alternative (PCAA) as the Environmentally Superior Alternative. Prepared as a result of the court ruling, it reduces impacts to Grasshopper Creek by 20% and improves wildlife connectivity in the northern part of the site, while retaining all housing. The RPDSEIR notes that the PCAA does not meet the Open Space/ Recreational Area Goal *to the same extent as* the proposed Project because there would be 37 acres less Recreation/Park. However, there would still be *130 acres* of Recreation/Park. This is a very substantial amount. There is no showing that 130 acres is inadequate, that land uses could not otherwise be rearranged, or that the increased natural open space of unfilled Grasshopper Creek does not provide a compensatory benefit. An alternative can be adopted even though it does not satisfy *every* goal as much as the proposed Project. The PCAA is fully feasible.

Conclusions and recommendations

A project bereft of all planning merit should not go forward. That is the case here. A plan over 30 years old, and flatly inconsistent with today's modern General Plan Safety and Land Use Elements, is far past any reasonable "sell by" date. *Your Commission is under no obligation to make Overriding Findings on behalf of the applicant.* Rather, significant and unavoidable impacts are legal grounds for denial. No vested rights accrue from the 1992 Specific Plan, whose Development Agreement expired. The project *should be denied* but followed by expeditious replanned to provide an economic use to the landowner which is consistent with the constraints of landslides, remote location, wildlife habitat and rare plants, and fire hazard.

Thank you for your consideration.

Yours truly,

Dan Silver
Executive Director

January 22, 2026

Los Angeles County Regional Planning Commission
Hall of Records
320 West Temple Street, Room 150
Los Angeles, CA 90012

RE: Support of Northlake Project – Project No. R2015-00408

Chair and Members of the Commission:

On behalf of the Golden State Gateway Coalition, we write to renew our strong support for the Northlake project.

The Golden State Gateway Coalition represents public-private sector stakeholders committed to improving transportation infrastructure, goods movement, and economic competitiveness along the Interstate 5 corridor and throughout the greater Southern California logistics and industrial network. From this perspective, Northlake represents a critical, long-planned investment that advances both transportation efficiency and workforce sustainability.

Northlake has been an active participant and supporter of the Golden State Gateway Coalition for decades, recognizing early on that land use, transportation, and economic development must be planned together. The project has consistently engaged in regional discussions around mobility, infrastructure funding, and corridor performance, and its development framework reflects that long-term commitment.

As the project moves forward, Northlake is anticipated to deliver approximately tens of millions in transportation infrastructure investments, supporting roadway improvements, system connectivity, and regional mobility. These investments are essential to maintaining efficient movement of people and goods along the I-5 corridor and within the Santa Clarita Valley.

Equally important is Northlake's role in addressing a structural imbalance that directly affects congestion and infrastructure performance: the growing disconnect between housing supply and employment centers.

Manufacturing, logistics, and industrial jobs in nearby commerce and industrial centers depend on a workforce that is increasingly forced to commute long distances due to housing costs and limited supply. Northlake's inclusion of housing priced for working families helps place workers closer to their jobs, reducing long-distance commuting, lowering vehicle miles traveled, and easing pressure on regional freeways.

Providing housing near employment centers is one of the most effective, and cost-efficient, ways to address congestion and improve transportation system performance.

Northlake represents the type of integrated land use and transportation planning that regional mobility strategies depend upon. Its long-standing engagement with the Golden State Gateway Coalition, significant infrastructure investment, and contribution to workforce housing make it a project of regional importance.

For these reasons, the Golden State Gateway Coalition respectfully urges the Los Angeles County Regional Planning Commission to support approval of the Northlake project.

Thank you for your leadership and consideration.

Sincerely,

John Musella

John Musella
Executive Director, Golden State Gateway Coalition

January 22, 2026

Los Angeles County Regional Planning Commission
Hall of Records
320 West Temple Street, Room 150
Los Angeles, CA 90012

RE: Support for the Northlake Project – Project No. R2015-00408 January 28, 2026 Regional Planning Commission Hearing

Honorable Chair and Members of the Commission:

On behalf of the Santa Clarita Valley Chamber of Commerce, I am pleased to submit this letter in strong support of the Northlake Project, scheduled for public hearing before the Los Angeles County Regional Planning Commission on Wednesday, January 28, 2026.

As the region's largest business advocacy organization, the Chamber views housing availability—particularly price-attainable housing for working families—as one of the most pressing economic development issues facing the Santa Clarita Valley and Los Angeles County today. Northlake directly addresses that need in a manner that is policy-consistent, environmentally responsible, and economically essential.

Housing as Economic Infrastructure
Employers throughout the Santa Clarita Valley consistently identify housing costs as a primary barrier to workforce recruitment and retention. Teachers, healthcare workers, first responders, skilled tradespeople, and service-sector employees are increasingly priced out of the communities they serve. Northlake's diversified housing program—including 315 affordable units representing approximately 10 percent of the total project—provides critically needed options for working families and seniors while supporting long-term regional economic stability.
Housing is economic infrastructure. Projects such as Northlake ensure that businesses can grow, expand, and retain talent locally rather than losing workers to longer commutes or other regions entirely.

A Proven, Longstanding Planning Framework
The Northlake Specific Plan was unanimously approved by the Los Angeles County Board of Supervisors in 1992, and the current proposal remains fully within the envelope of that approved plan, while updating the community to reflect modern standards for sustainability, walkability, and environmental performance.

The project is consistent with the Los Angeles County General Plan and the Santa Clarita Valley Area Plan, "One Valley, One Vision" (OVOV), which explicitly identifies this area for future growth and housing opportunity.

Economic and Fiscal Benefits
In addition to meeting housing needs, Northlake will:

- Support local businesses through population growth and consumer demand
- Generate construction and permanent employment opportunities
- Strengthen local school enrollment and funding stability

- Deliver commercial and mixed-use development that supports services closer to where people live and work

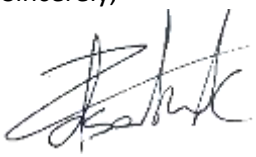
These benefits contribute to a more resilient and balanced regional economy.

Responsible Growth and Environmental Stewardship
The Chamber also recognizes the project's significant environmental and recreational commitments, including expanded open space, enhanced parks, wildlife connectivity, and an integrated trail and active transportation network. This approach demonstrates that economic growth and environmental stewardship are not mutually exclusive, but rather complementary when guided by sound planning.

Northlake represents the type of thoughtful, long-term investment needed to support a healthy regional economy—one that balances housing affordability, job creation, environmental protection, and quality of life.

For these reasons, the Santa Clarita Valley Chamber of Commerce respectfully urges the Regional Planning Commission to support approval of the Northlake Project.
Thank you for your consideration.

Sincerely,



Ivan Volschenk
President & CEO, Santa Clarita Valley Chamber of Commerce

LOZEAU DRURY LLP
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1939 Harrison Street, Ste. 150
Oakland, CA 94612
www.lozeaudrury.com
victoria@lozeaudrury.com

Via Email

January 27, 2026

Elvin W. Moon, Chair
Yolanda Duarte-White, Vice Chair
David W. Louie, Commissioner
Pam O'Connor, Commissioner
Michael R. Hastings, Commissioner
Regional Planning Commission
Los Angeles County
320 W. Temple Street, Room 150
Los Angeles, CA 90012
comment@planning.lacounty.gov

Jodie Sackett, Planner
Department of Regional Planning
County of Los Angeles
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
jsackett@planning.lacounty.gov

Re: Comment on the Recirculated Partial Final Supplemental Environmental Impact Report for the NorthLake Specific Plan Project; January 28, 2026 Los Angeles County Planning Commission Agenda Item 7

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

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

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

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

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

2. The RPFSEIR failed to adequately analyze vehicle miles traveled ("VMT") impacts because it applied an incorrect and outdated threshold of significance to measure impacts. The Department of Transportation's ("DOT") May 29, 2025 comment on the Draft SEIR states that the County applied an outdated threshold to measure VMT impacts. (RPFSEIR, p. A.2-3.) Specifically, the DOT explains that the County incorrectly applied the prior Northlake Specific Plan VMT per service population (27.03) as the significance threshold for determining an impact. However, the VMT per Service Population (27.03) is the baseline for comparison to the previously approved Project. The County was required to apply the VMT per Service Population (25.70) per the methodology required by the County Department of Public Works. Therefore, the RPFSEIR's less-than-significant conclusion for VMT impacts cannot be relied upon. A revised Draft SEIR should be prepared and recirculated that includes an adequate analysis of the Project's VMT impacts using the proper threshold of significance.

3. Since the Project will have significant unmitigated impacts, the City must analyze whether the Project's economic benefits exceed its environmental impacts before adopting a statement of overriding considerations. (14 Cal. Code Regs. § 15043; Pub. Res. Code § 21081(B); *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1222.) Key among the findings that the lead agency must make is that:

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

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

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

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

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

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

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

Sincerely,

Victoria Yundt
Lozeau Drury LLP

SUPPLEMENTAL FINDINGS OF FACT and STATEMENT of OVERRIDING CONSIDERATIONS regarding the NORTHLAKE SPECIFIC PLAN PROJECT

PROJECT NUMBER: R2015-00408-(5)

VESTING TENTATIVE TRACT MAP: TR073336

CONDITIONAL USE PERMIT: CUP2023004316

STATE CLEARINGHOUSE NUMBER: 2015031080

COUNTY OF LOS ANGELES DEPARTMENT OF REGIONAL PLANNING

320 WEST TEMPLE STREET

LOS ANGELES, CALIFORNIA 90012

SUPPLEMENTAL FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE NORTHLAKE SPECIFIC PLAN PROJECT

(STATE CLEARINGHOUSE NUMBER 2015031080)

(COUNTY PROJECT NUMBER R2015-00408-(5))

The Board of Supervisors (Board) of the County of Los Angeles (County) hereby certifies the NorthLake Specific Plan Supplemental Environmental Impact Report, State Clearinghouse Number 2015031080, which consists of the Draft Supplemental Environmental Impact Report (Draft SEIR) dated May 2017, Technical Appendices to the Draft SEIR, the Final Supplemental Environmental Impact Report, including Responses to Comments dated January 2018, the February 2018 Errata, the April 4, 2018 Errata, the August 2018 Second Errata, Recirculated Portions of the Draft Supplemental EIR (RPDSEIR) dated March 2025, and Recirculated Portions of the Final Supplemental EIR (RPFSEIR) dated August 2025 (collectively referred to as the "Final SEIR") and finds that the Final SEIR has been completed in compliance with the California Environmental Quality Act (Public Resources Code §§ 21000, *et seq*.) (CEQA). The Board further hereby certifies that it has received, reviewed, and considered the information contained in the Final SEIR; the applications for Vesting Tentative Tract Map (VTTM) No. TR073336, and Conditional Use Permit (CUP) No. CUP2023004316 (collectively, Project Approvals) to permit the implementation of the previously approved NorthLake Specific Plan (Project); all hearings and submissions of testimony from officials and departments of the County, the Applicant NorthLake Associates LLC (Applicant), the public, and other municipalities and agencies; and all other pertinent information in the record of proceedings. Concurrently with the adoption of these supplemental findings, the Board adopts the Mitigation Monitoring and Reporting Program (hereinafter referred to as the "MMRP") attached as Exhibit A to these findings and readopts the findings set aside by the Board on May 18, 2021 (as revised herein) attached as Exhibit B to these supplemental findings.

Having received, reviewed, and considered the foregoing information, as well as any and all other information in the record, the Board hereby makes supplemental

findings regarding the Project's significant effects as it relates to the RPDSEIR and RPFSEIR pursuant to and in accordance with Section 21081 of the Public Resources Code as follows:

(a) Changes or alterations have been required in, or incorporated into, the Project which mitigate or avoid the significant effects on the environment.

(b) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency,

(c) Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the environmental impact report.

UPDATED BACKGROUND

NorthLake Specific Plan and Previous Environmental Impact Report

In 1992, the County adopted the NorthLake Specific Plan (SP No.87-172) (Specific Plan). The Specific Plan established land uses and development standards for an approximate 1,330-acre area of undeveloped land east of Interstate 5 (I-5), west of Castaic Lake, and north of the community of Castaic in unincorporated Los Angeles County, California (Project Site). As adopted, the Specific Plan permitted the development of 3,623 dwelling units, as well as 13.2 acres of commercial uses, 50.1 acres of industrial uses, and supporting infrastructure and public services uses, including schools, parks, a potential library site, a potential fire station site, and an 18-hole golf course.

In addition to the 1992 approval of the Specific Plan, the County adopted a Conditional Use Permit (CUP No. 87 172-(5)). This CUP, sometimes referred to as the Master CUP, addressed the permitted land uses as defined in the Specific Plan, including intensity of development and related grading consistent with the County of Los Angeles' Grading Ordinance in effect at the time. The Specific Plan and Master CUP acknowledged that future implementation of the Specific Plan would require a subsequent CUP to accomplish Site Plan review for Project implementation.

In conjunction with its consideration of the Specific Plan, in 1992 the County prepared and certified the NorthLake Specific Plan EIR (1992 SP EIR) (SCH No.

1988071329) as a Program EIR. As defined in the State CEQA Guidelines (Section 15168), a Program EIR is an EIR prepared on a series of actions that can be generally characterized as one large and related project. The Program EIR is used with later/subsequent activities to determine whether additional environmental documentation will be necessary and/or to simplify the scope of additional environmental documentation.

Subsequent to the 1992 approval of the Specific Plan, market conditions and changes in property ownership placed development of the Specific Plan on hold.

Supplemental Environmental Impact Report (SEIR)

The project analyzed in the SEIR (the Project or proposed Project) would implement the previously adopted Specific Plan, but with a reduction of the area and intensity of physical development and corresponding increase in open space as compared to the approved Specific Plan project that was considered in the 1992 SP EIR. Specifically, the Project would involve the phased development of up to 3,150 residential units, 9.2 acres of commercial uses, 13.9 acres of industrial uses, 799.5 acres of parks and open space, a 22.9-acre school site in the Phase 2 area (in addition to the already constructed Northlake Hills Elementary School), and a 1.4-acre pad for a future fire station. As compared to the approved Specific Plan, the Project represents reductions of 473 residential units, four acres of commercial uses, 36.4 acres of industrial uses, elimination of the 167-acre golf course, and increases of 165.3 acres of open space and 167 acres of trails and parks.

To implement the Project, the Applicant requested approval of: (1) VTTM 073336 to subdivide a 720-acre portion of the Project Site (as described below); and (2) CUP No. 201500019 to authorize: (a) Specific Plan Site Plan review; (b) grading exceeding 100,000 cubic yards; and (c) construction of water tanks and water supply infrastructure. As the Project is consistent with the Specific Plan, no amendments to the Specific Plan would be required.

The Project consists of development of Phase 1, Phase 2, and associated off-site external map improvements in both Phase 1 and Phase 2 totaling 65.13 acres (External Map Improvements Area), which include remedial grading, drainage features, and road and utility alignments (the External Map Improvements). As originally proposed, Phase

1 would comprise development of a 720-acre portion of the Project Site with a total of 1,974 dwelling units, including 588 single-family units on approximately 73.3 acres, 1,041 multi-family units on approximately 74.5 acres, and 345 senior multi-family units on approximately 49.1 acres. Phase 1 would also include, and lots would be also provided for, light industrial uses (13.7 acres), commercial development (9.2 acres), open space and parks (414.3 acres), roadways (84.3 acres), and a fire station pad (1.4 acres).

The remainder of the Project Site, referred to as the Phase 2 area, would be developed with 1,176 single family homes, 385.2 acres of parks, trails, and open space, 43.5 acres of school uses, and 36.2 acres of associated roadway and infrastructure improvements. Phase 2 is included in VTTM 073336 and the current CUP request as 21 large lot parcels (40 acres or more) for future lease and finance purposes. Future development of Phase 2, which will require a project-specific CUP, has been fully analyzed in the Final SEIR.

The External Map Improvements will consist of the construction of Ridge Route Road at the Project's main entrance to the south and a secondary access route to the northwest; construction of NorthLake Parkway adjacent to and west of the Phase 2 portion of the proposed Project Site, a 4.64-acre connection of Grasshopper Creek Park, a debris basin, 2.39 acres in trail connections, a 5.1-acre pad for a water tank, 29.79 acres of manufactured slopes and 11.98 acres of natural open space. In addition, extensions of the existing electrical distribution circuitry would occur along the existing Ridge Route Road to reach the proposed Project, and substation upgrades would occur on Southern California Edison property.

In addition to the above improvements, an existing crude oil pipeline easement containing two oil pipelines that traverse the entire north-south length of the Project Site will be relocated to an alignment along the eastern boundary of the proposed development area and within the identified grading footprint.

Under the Project, minor additions and changes were required to be made to the 1992 SP EIR to adequately analyze: (1) the revised scope of development; (2) changes to environmental conditions; and (3) the addition of project-specific analysis since its adoption.

In addition to the 1992 SP EIR, 2012, the Final Program EIR for the Santa Clarita Valley Area Plan, One Valley One Vision, 2012 ("2012 SCVAP EIR") was certified and included the Specific Plan as a future entitled development. In light of the existing environmental analysis performed under the 1992 SP EIR and the 2012 SCVAP EIR, and as the Lead Agency responsible for CEQA compliance for the Project, the County reviewed the need for additional environmental documentation and determined that a supplemental environmental impact report to the 1992 SP EIR should be prepared for the Project.

Consistent with the State CEQA Guidelines Section 15163, which defines the role and use of a SEIR, the purposes of the SEIR prepared for the Project are: (1) to address minor additions and changes that would update information in the 1992 SP EIR and 2012 SCVAP EIR to reflect current environmental conditions and thereby make the previous EIR adequate for use by the Project; (2) to provide Project-level analysis as appropriate for those issues for which more detailed Project information is now known for Project implementation; and (3) to provide updated program-level analysis as appropriate for those issues pertaining to Phase 2 for which more detailed Project information is not now known. In addition to updating program-level information from the 1992 SP EIR, this SEIR evaluates Project-level impacts from implementation of the Specific Plan, including both development of Phase 1, as well as future development of Phase 2.

In compliance with the State CEQA Guidelines, the County conducted an Initial Study of the proposed Project and determined that an SEIR would be the appropriate environmental document to analyze the Project's potential impacts to the environment, as there have been additions and changes to the Specific Plan project, but they would not require major revisions to the 1992 SP EIR. The Initial Study identified a preliminary range of potential impact issues to be analyzed. A Notice of Preparation (NOP) and the Initial Study were distributed to responsible and interested agencies and key interest groups to solicit comments and to inform the public of the proposed Project. The NOP/Initial Study was distributed on March 24, 2015, for a 30-day review period, as required by CEQA. In addition, the County held a scoping meeting for the Draft SEIR on April 8, 2015. The purpose of the meeting was to solicit input from interested

agencies, individuals, and organizations regarding the Project, alternatives, mitigation measures, and significant effects to be analyzed in the Draft SEIR.

Potentially significant environmental impacts addressed in the Draft SEIR include Air Quality, Biological Resources, Cultural Resources, Energy, Hazards and Hazardous Materials, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Noise, Transportation/Traffic, and Utilities and Service Systems. The Draft SEIR analyzed both individual component and cumulative effects of the Project together with related projects on these topics and identified a variety of mitigation measures to mitigate the potential adverse effects of the Project.

In accordance with CEQA requirements, the Draft SEIR also analyzed potential alternatives to the Project, including (1) No Project/No Development Alternative, (2) No Project/Development Pursuant to the Approved NorthLake Specific Plan, (3) No Industrial Development Alternative, and (4) Phase 1 Development Alternative. Potential environmental impacts of each of these alternatives were discussed as required by CEQA and each alternative was compared to the Project. The above range of alternatives was a reasonable range for consideration and allowed for informed decision making among the alternatives as well as to direct specific changes to the Project.

The Los Angeles County Department of Regional Planning (DRP) conducted its own independent departmental review and analysis of the Project and the preliminary Draft SEIR and circulated copies of the preliminary Draft SEIR to all affected County agencies. Interested County agencies conducted an independent review and analysis of the Project and preliminary Draft SEIR and provided written comments on the document, where appropriate, and those comments were incorporated into and made part of the Draft SEIR.

The Draft SEIR for the proposed Project was released for public review on May 2, 2017, and circulated for public review and comment for a 45-day period ending on June 15, 2017. In compliance with Section 15087 of the State CEQA Guidelines, the County provided public Notice of Availability (NOA) of the Draft SEIR at the same time it sent a Notice of Completion to the Office of Planning and Research. The County used several methods to solicit comments on the Draft SEIR. The NOA, along with a CD containing the Draft SEIR and technical appendices, were mailed to various agencies

and organizations and to individuals who had previously requested such notice. The Draft SEIR was submitted to the State Clearinghouse for distribution to and review by State agencies. The NOA was also mailed to all property owners and occupants within 500 feet of the Project Site; homeowners associations within 500 feet of the Project Site; and all interested parties who previously called, corresponded, attended an EIR scoping session, and/or provided comments on the IS/NOP. Additionally, the NOA was posted on the Project Site and off site at two separate locations. Copies of the Draft SEIR were available for review at three public libraries and at the County Department of Regional Planning counter. The Draft SEIR was also available on the County's website by typing "Northlake" or "R2015-00408" into the case archive search box at this web address: http://planning.lacounty.gov/case. In addition, the County held a public hearing regarding the Project before a Hearing Examiner on May 24, 2017 to take public comments.

Following the close of public comment period on the Draft SEIR on June 15, 2017, detailed responses to all public agency comments and comments received from members of the general public regarding the Project and the analyses of the Draft SEIR were prepared by DRP staff with assistance of a private consultant and reviewed and revised as necessary by DRP and other County staff to reflect the County's independent judgment on issues raised. These Responses to Comments are included in the Final SEIR. In addition to correspondence from the Governor's Office of Planning and Research, 22 comment letters regarding the Project and Draft SEIR were received by the County; four of these letters were received after the end of the 45-day public review period. All of the comment letters received by the County were included and responded to within the Final SEIR. Additionally, a transcript of the Hearing Examiner meeting is included in the Final SEIR.

The Final SEIR was prepared by the County in accordance with CEQA, and State and County Guidelines for implementation of CEQA. More specifically, the County relied on Section 15084(d)(3) of the State CEQA Guidelines, which allows acceptance of drafts prepared by the applicant, a consultant retained by the applicant, or any other person. DRP, acting for the County, has reviewed, considered, revised,

and edited as necessary the submitted drafts to reflect its own independent judgment, including reliance on County technical personnel from other departments.

Minor Project Revisions and Errata

An Errata was prepared to address late comments regarding the Final SEIR included as part of the February 15, 2018 Supplemental Memo For Additional Project Information (February Errata). The revisions involve only minor changes to the distribution of land uses and an overall reduction in density and intensity or use, and the Errata merely clarified or amplified or made insignificant modifications in the adequate SEIR, which, in combination with the Errata, was appropriate for analyzing the environmental impacts of the Project, as revised.

At the February 21, 2018 public hearing, the Regional Planning Commission requested that the Applicant include an affordable housing component in the Project. Based on this request, the Applicant made minor revisions to the Project analyzed in the SEIR to include an affordable component. Specifically, the Applicant eliminated 108,283 square feet (SF) of industrial use and 13,197 SF of commercial land uses and redesignated the industrial areas and remaining 31,200 SF of commercial land uses (excluding Highway Commercial) as Mixed Use Neighborhood Commercial. The residential total at full buildout remains 3,150 units. However, 321 units will be reallocated from the Phase 2 area of the Project to the Phase 1 area (for a total of 2297 Phase 1 units). This includes six market-rate live-work units, which would combine residential living space with commercial space.

In addition, a total of 315 units will be deed restricted as affordable as defined by the County and developed over both phases. Of the 315 affordable units, 95 would be designated as senior-living affordable units. The senior-living affordable units would be available to occupants aged 55 and over who meet the minimum criteria to qualify for affordable housing. The remainder of the affordable housing units would not have any age restrictions.

An Errata dated April 4, 2018 (April Errata) was prepared to determine whether these minor changes would change any of the conclusions of the SEIR. The April Errata shows that (a) the revisions result in a project that is substantially consistent with the Project as analyzed in the SEIR, (b) the revisions would not result in a new

significant impact from the Project or a new mitigation measure or a substantial increase in the severity of previously identified effects, (c) there is no feasible project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the Project, but the Project's proponents decline to adopt it, and (d) the SEIR was not inadequate or conclusory in nature. The revisions involve only minor changes to the distribution of land uses and an overall reduction in density and intensity or use, and the April Errata merely clarified or amplified or made insignificant modifications in the adequate SEIR, which, in combination with the Errata, is appropriate for analyzing the environmental impacts of the Project, as revised.

On April 18, 2018, the Regional Planning Commission adopted the required findings, certified the SEIR, and granted the requested Project approvals. The Center for Biological Diversity, Santa Monica Mountains Conservancy, and Golden State Environmental Justice Alliance (collectively, Appellants) each filed an appeal (collectively, the Appeals) of the Commissions' actions, including the certification of the SEIR and requested Project approvals.

An additional Errata was prepared in August 2018 (August Errata) to make minor technical corrections in the Final SEIR and to provide further information in response to public comments at the Regional Planning Commission meeting, including information of suitable on- and off-site habitat available to implement mitigation measures for biological resources and a health risk assessment for sensitive receptors' proximity to the I-5 freeway. The August Errata did not disclose any new or substantially increased environmental effects of the Project, any feasible project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the significant environmental impacts of the Project, or any significant new information requiring recirculation of the SEIR. The August Errata included only minor technical changes to the SEIR and additional information to support the SEIR's conclusions, and the August Errata merely clarified or amplified or made insignificant modifications in the adequate SEIR, which, in combination with the February Errata (hereinafter, the term SEIR shall refer to the SEIR and all of the Errata), remains appropriate for analyzing the environmental impacts of the Project, as revised. On

September 25, 2018, the Board held a public hearing on the Appeals, took public testimony, and then voted to reject the Appeals, uphold the Regional Planning Commission's approval of the Project, and certify the SEIR. On April 2, 2019, the Board adopted the Project entitlements, CEQA findings, MMRP, and Project conditions.

CEQA Litigation and Preparation of the RPDSEIR

On May 1, 2019, Center for Biological Diversity and Endangered Habitats League filed a Petition for Writ of Mandate (Petition) in the Los Angeles Superior Court challenging the County's approval of the Project under CEQA (*Center for Biological Diversity and Endangered Habitats League v. County of Los Angeles, et al, and Real Parties in Interest, Northlake Associates, et al,* Case No. 19STCP01610). On January 11, 2021, the Court issued its ruling (Court Ruling), finding that the County did not comply with CEQA in certain respects in approving the Project, and granting in part and denying in part the Petition. The Court Ruling ordered the County to set aside all of their Project approvals and revise the SEIR as directed in the Court Ruling.

On February 1, 2021, the Court issued a Writ of Mandate and Judgment. The Writ of Mandate obligated the County to set aside its certification of the SEIR, its adoption of the Findings of Fact, Statement of Overriding Considerations, and MMRP, its approval of the Northlake Specific Plan Project (Project No. 2015-00408-(5)), the Vesting Tentative Parcel Map No. 073335-(5), Conditional Use Permit No. 2015-00019-(5), and Vesting Tentative Tract Map No. 073336-(5), and any other associated approvals (Project Approvals). The approval of the 1992 Specific Plan was not a rescinded approval as it was previously approved and beyond challenge.

On May 18, 2021, the Board set aside all Project Approvals, including certification of the SEIR. On April 14, 2025, the RPDSEIR, prepared in response to the Court Ruling, was made available for public review and comment for a 45-day comment period. The RPDSEIR contained the following revised and updated portions and/or sections to be recirculated for public comment:

(1) Revised biological impact analysis only as to the Western Spadefoot Toad (WST) and special-status plants, as well as impact assessment for Crotch's Bumblebee (CBB),

(2) Updated Traffic Analysis as to Vehicle Miles Travelled (VMT) pursuant to Senate Bill (SB) 743 and CEQA Guidelines Section 15064.3,

(3) Updated Wildfire Analysis pursuant to Appendix G of the CEQA Guidelines, and

(4) Revised alternatives analysis only as to the addition of a Creek Avoidance Alternative and a Partial Creek Avoidance Alternative.

Following the close of public comment period on May 29, 2025, detailed responses to all public agency comments and comments received from members of the general public regarding the Project and the analyses in the RPDSEIR were prepared by DRP staff with assistance of a private consultant and reviewed, and revised as necessary by DRP and other County staff to reflect the County's independent judgment on issues raised. These Responses to Comments are included in the RPFSEIR. The County received eight comment letters regarding the RPDSEIR. All of these comment letters were included and responded to within the RPFSEIR.

The RPFSEIR has been prepared by the County in accordance with CEQA, and State and County Guidelines for implementation of CEQA. More specifically, the County has relied on Section 15084(d)(3) of the State CEQA Guidelines, which allows acceptance of drafts prepared by the applicant, a consultant retained by the applicant, or any other person. DRP, acting for the County, has reviewed, considered, revised, and edited as necessary the submitted drafts to reflect its own independent judgment, including reliance on County technical personnel from other departments.

On October __, 2025, the Regional Planning Commission, upon the recommendation of DRP, adopted the Partial Creek Avoidance Alternative (PCAA), the environmental superior alternative, as the proposed Project along with adopted the required findings, certified the SEIR (including the RPDSEIR and RPFSEIR), and granted the requested Project approvals.

Section 1 of these supplemental findings discusses the potential environmental effects of the Project assessed in the sections that were recirculated (including WST, CBB, Rare Plants, VMT and Wildfire). Section 2 discusses the evaluation of the two additional Alternatives analyzed in the RPDSEIR. Section 3 discusses the Project's MMRP. Section 4 contains the Statement of Overriding Considerations. Section 5

contains the findings pursuant to State CEQA Guidelines Sections 15091 and 15092. Section 6 contains the findings pursuant to Public Resources Code Section 21082.1(c)(3). Section 7 contains a finding that no recirculation is required. Section 8 identifies the custodian of the record upon which these findings are based. Section 9 sets forth additional CEQA findings. The findings set forth in each section are supported by substantial evidence in the administrative record of the Project.

SECTION 1
SUPPLEMENTAL CEQA FINDINGS

All mitigation measures (as set forth in the MMRP attached as Exhibit A to these findings) have been incorporated by reference into the Project's conditions of approval. In addition, the other required conditions of the Project Approvals further lessen the potential effects of the Project.

The County has determined, based on the RPFSEIR, that the Project's design features, mitigation measures, and conditions of approval will reduce Project-specific impacts concerning Biological Resources (WST, CBB, Rare Plants), Transportation (VMT), and Wildfire to less than significant levels.

The County has further determined, based on the RPFSEIR, that there are no significant cumulative impacts, or that the Project's design features, mitigation measures, and conditions of approval will reduce the Project's contribution to less than cumulatively considerable levels, concerning Biological Resources (WST, CBB, Rare Plants), Transportation (VMT), and Wildfire.

1. Biological Resources - WST

Potential Effect

The Project could have a substantial adverse effect, either directly or through habitat modifications, on WST.

Finding

With implementation of the mitigation measure identified in the RPDSEIR and approved by the California Department of Fish and Wildlife (CDFW), potential impacts to WST would be reduced to a less than significant level during construction and operation of the Project.

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen potential significant environmental effects to WST, and the biological resources (WST) impacts of the Project would be less than significant.

Facts

Potential impacts to the WST are discussed in Section 2.1 of the RPDSEIR, as well as in the RPFSEIR.

The WST is a species of amphibian in the family Scaphiopodidae. It is found in western California (USA) and northwestern Baja California (Mexico). WST is a relatively smooth-skinned species of American spadefoot toad. Its eyes are pale gold with vertical pupils. It has a green or grey dorsum, often with skin tubercles tipped in orange, and has a whitish color on the abdomen. On each hind foot is a wedge-shaped black spade. Adult toads are between 3.8 cm and 7.5 cm (1.5 in and 3.0 in) long. Juveniles have a similar appearance to adults, but with more distinct spotting. It is nocturnal, and activity is limited to the wet season, summer storms, or during evenings with elevated substrate moisture levels.

WST was observed on the Project Site during various general and focused amphibian surveys, as well as during focused surveys for listed fairy shrimp species within seasonal pools. The surveys that observed WST were conducted during years with well above-average rainfall (2004/2005) and below-average rainfall (2014). While numerous ephemeral ponds and features have been observed on the Project Site over time during various surveys for different species, only three features have been observed to contain WST, and only one additional feature was observed to contain potential WST habitat, despite no WST being observed in this latter feature. Subsequent surveys were conducted in 2023 and 2024.

The Project Site contains a maximum of four ponded features that can support WST. These four ponded features will be potentially impacted by the Project. As shown in RPDSEIR Table 2-4, the four ponded features total 0.95 acres of habitat for the WST. The loss of 0.95 acres of habitat for the WST would be considered significant before mitigation. With implementation of revised MM 5.2-9, the impact would be reduced to a less than significant level. Revised MM 5.2-9 is designed to recreate the optimal conditions for WST habitat that was observed and documented in the 2006 BonTerra fairy shrimp report.

Rationale For Expecting Success With Mitigation

As noted in the WST Report (RPDSEIR Appendix B-1), and summarized in the RPDSEIR, WST has shifted habitat use in portions of California from vernal pools to artificial ponds such as stock ponds and other ponding features of anthropogenic origin, many of which have created WST breeding areas quite by accident. As such, any

assertions that it is difficult to create ponds that are suitable for WST breeding are not accurate. Glenn Lukos Associates (GLA), the Project biologist, has been involved in WST habitat creation projects that have been successful and provided an example of one such effort that has been well-studied since the seasonal ponds were created in 2005 and 2006 on Irvine Mesa in an area known as East Orange, which is now part of the Orange County Central Coastal Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) Reserve. The 15 created pools overall achieved performance standards after six years of monitoring and included breeding WST in eight of the pools as of the 2009/2010 rainfall season. It is important to note that the performance standards included a number of components that were focused on the quality of the created pools and included hydroperiod (length of ponding) as it was recognized that this is clearly the most critical component of WST pond creation. The presence of fairy shrimp, a common food source for WST larvae, are an important pool component and these, along with the egg masses and larvae were introduced from the impact pools to the created pools. It was understood that pools with the proper characteristics would ultimately support WST. Thus, the results of follow-up studies conducted up to seven years following completion of the initial program, showed that WST had expanded to 12 pools within the 15-pool complex. Importantly, even in a drought year the pools exhibited sufficient ponding for breeding, though as is often the case for WST in such years, desiccation resulted in the loss of many tadpoles. Revised MM 5.2-9, below, is based on GLA's expert and successful experience in creating ponds that are suitable for WST breeding. The Western Spadefoot Toad Impact Assessment and Habitat Mitigation and Monitoring Plan, which is incorporated into revised MM 5.2.9, also includes a 10-year monitoring and maintenance program and contingency measures that would be implemented should WST translocation of inoculum not be on a trajectory for meeting the final success criteria. CDFW reviewed and approved the Western Spadefoot Toad Impact Assessment and Habitat Mitigation and Monitoring Plan.

Impact Conclusion and Mitigation Measures

Potentially significant direct impacts on WST would be reduced to less than significant after implementation of revised MM 5.2.9.

Mitigation Measure

MM 5.2-9 A mitigation program for western spadefoot toad (WST) shall be implemented prior to construction, ground disturbance, or vegetation removal that would impact the WST breeding habitat, or areas within 1,000 feet of WST-occupied ponds within the Project Site. The mitigation program would include the components set forth below. A detailed methodology for this effort shall be reviewed by the CDFW and the LACDRP prior to implementation of the mitigation program. Results of the mitigation program shall be provided to the CDFW and the LACDRP.

- Prior to implementing the Spadefoot Relocation Plan, two focused surveys during average or above-average rainfall years will be conducted within the prior appropriate seasons. If any additional ephemeral ponds are determined to be occupied besides those identified in recent surveys (i.e., 2015), the Spadefoot Relocation Plan will be modified to include replacement of the additional occupied pond as well as those identified in recent surveys.
- Suitable sites for seasonal pond creation, within the Project open space, specifically within other NorthLake-owned properties, have been identified and 1.07 acres of seasonal pond habitat will be created. The specific location of the 1.07-acre pool complex is depicted on Exhibit 5 of the NorthLake Castaic, Los Angeles County, California, Western Spadefoot Toad Impact Assessment and Habitat Mitigation and Monitoring Plan July 2022 (Revised March and June 2023) (HMMP). As described in the WST Mitigation Implementation Plan, three pools would be created based on current grading plans. The combined size of the three pools (1.07 acres) exceeds the maximum combined size of potential WST habitat currently at the Project Site (0.95 acres, as shown in Table 2-4, above). The WST Mitigation Implementation Plan would address the following issues specific to the site or sites:
  - Soil Characteristics and whether clay liners will be necessary
  - Pool locations and site access routes for construction

        - Types of habitat potentially affected by construction and measures to restore damaged habitat, subject to temporary impacts
        - Watershed size and characteristics
        - Grading plan with cross section for each pool to be created
        - Specifications for clay liner (in needed) including source of clay and installation methods
        - Upland habitat characteristics, including soil suitability for burrowing and vegetative buffer, will also be addressed in the plan
    - Following creation of the 1.07-acre pool complex or complexes and prior to grading of the impacted pools, each pool within each complex will be monitored during the rainy season to ensure that the created pools exhibit at least 60 days of ponding during an average or above-average rainfall year.
    - Following documentation of adequate ponding for each created pool during an average or above-average rainfall year, and prior to grading of the impacted pools, soil inoculum from the impacted pools will be translocated to the created pools to provide a food source for WST.
    - Following documentation of adequate ponding for each created pool during an average or above-average rainfall year, and prior to grading of the impacted pools, WST egg masses, larvae and metamorphs will be translocated to the created pools for at least two wet seasons where WST egg masses, larvae and metamorphs are present in the impact pools and suitable conditions to receive the WST egg masses, larvae and metamorphs are present in the created pools. In addition, data regarding successful breeding will be submitted to CDFW for concurrence that sufficient reproduction has occurred to allow impacts to the pools in the development area.
    - During grading of the pools to be impacted, the Project Biologist will be present to rescue any adult WST that would be relocated to the created pool complex.

- Following the two seasons of translocation of WST egg masses, larvae and metamorphs, and successful breeding, the created pools will be monitored for ten years as set forth in HMMP Table 6 (Conceptual Schedule for Pond Creation Milestones) to document the progression of the WST toward the performance standards provided in the WST HMMP prepared for the project:
    - **Hydrological Monitoring Performance Standard**. Ponding duration of at least 60 days must be documented to occur during average or above average rainfall years prior to translocation of egg masses, larvae, metamorphs, or adults. Ponding duration of at least 60 days must also be documented during the 10-year monitoring period. At the end of the ten-year monitoring period, this performance standard will have been achieved if ponding duration equals or exceeds ponding duration of 60 days during average or above-average rainfall years. It is important to note that during below-average rainfall years, depending on the severity of drought conditions that the created ponds will not pond for sufficient duration to allow WST to reach maturity. Thus, during the ten-year monitoring period, it is to be expected that some years will not pond for 60 days. Nevertheless, the performance standard for hydrology will be considered achieved as long a ponding for 60 days occurs during average rainfall years. Finally, hydrology may be augmented at the direction of the Project Biologist, especially once breeding is observed and is threatened by declining water levels in the pools due to lower-than average rainfall. In the event that the Project Biologist determines that additional water should be added to any pond occupied by egg masses or larvae, it will be necessary to ensure protection of the egg masses and larvae by discharging water to the pool(s) in a manner that does not disturb the egg masses or larvae and does not result in the erosion of soil into the pool(s). This could be accomplished through temporary placement

of large gravel at the discharge site (at the edge of the pool(s)) underlain by plastic that would allow the water to enter the pool(s) slowly and with no sediment.

- **Performance Standard Prior to Grading**. Prior to Project grading that removes the impacted doner pools, during an average or above-average rainfall year, at least two of the three created ponds within the pond complex exhibits emergence of metamorphs in each pond to ensure breeding in subsequent years. Successful breeding would be determined by the presence of egg masses that are not present due to translocation but which occur due to reproduction. Should this occur during a below-average rainfall year, the condition would be satisfied as it would show that the pools are performing as intended. In any case, data regarding successful breeding will be submitted to CDFW for concurrence that sufficient reproduction has occurred to allow impacts to the pools in the development area.
- **Performance Standard Post-Grading**. Following Project grading that removes the impacted donor pools, during an average or above-average rainfall year, at least two of the three created ponds within the pond complex will exhibit breeding as indicated by the presence of WST egg masses, tadpoles/larvae/ or metamorphs, to confirm establishment of breeding WST for each pond complex created. Should this occur during a below-average rainfall year, the condition would be satisfied as it would show that the pools are performing as intended.

2. <u>Biological Resources – Rare Plants</u>

Potential Effect

The Project would have a potentially significant impact on five special-status plant species – Round-Leaved Filaree, Paniculate Tarplant, Southwestern Spiny Rush, Slender Mariposa Lily, and Club-Haired Mariposa Lily.

Finding

With implementation of the mitigation measure identified in the RPDSEIR and approved by CDFW, potential impacts to Rare Plants (Round-Leaved Filaree, Paniculate Tarplant, Southwestern Spiny Rush, Slender Mariposa Lily, and Club-Haired Mariposa Lily) would be reduced to a less than significant level during construction and operation of the Project.

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen potential significant environmental effects to rare plants (Round-Leaved Filaree, Paniculate Tarplant, Southwestern Spiny Rush, Slender Mariposa Lily, and Club-Haired Mariposa Lily), and the biological resources (Round-Leaved Filaree, Paniculate Tarplant, Southwestern Spiny Rush, Slender Mariposa Lily, and Club-Haired Mariposa Lily) impacts of the Project would be less than significant.

Facts

Round-Leaved Filaree

Round-leaved filaree was observed during 2001 plant surveys, when 39 plants were observed within the Project development boundary. However, this species was not observed during surveys conducted in 2014, indicating that this species may have been extirpated from the Project Site. Site visits on April 6 and 14, 2022 to the site location where the species was previously detected in 2001 did not find the population, consistent with the finding that the population may have been extirpated. If this species is not detected during pre-construction plant surveys, it would be considered extirpated, and no mitigation would be required.

In November 2017, the California Native Plant Society removed this species from the “Inventory of Rare and Endangered Plants” changing the status from 1B.2 to CBR with the note: “Too common statewide,” with the additional comment: “counties that contain small, localized populations under severe threat should track *C. macrophylla* as a species of local concern.” This species has over 600 reported occurrences in CalFlora statewide. Thus, this species no longer has special status in California. The round-leaved filaree is not listed on an official local or regional plan; nevertheless, there are only a few occurrences in northern Los Angeles County, and it is considered locally rare. Therefore, potential impacts to this species, if determined to be present, would be

considered significant under CEQA. With implementation of MM 5.2-5(a), below, the impact would be reduced to a less than significant level.

Rationale For Expecting Success With Mitigation

Round-leaved filaree is an annual herb that reproduces by seed in open areas such as grasslands and in openings in coastal sage scrub. Collection of seed with germination, propagation, and translocation of propagated plants to suitable habitat/soils by a qualified nursery or similar institution, as set forth in MM 5.2-5(a) below, will ensure a high probability of success for the translocation program. The round-leaved filaree translocation program also includes a ten-year monitoring and maintenance program and contingency measures that would be implemented should translocation sites not be on a trajectory for meeting the final success criteria.

Paniculate Tarplant

Paniculate tarplant was observed in 2014 in a single population that consisted of several hundred individual plants, all of which occur within the Project's development boundary. The population was detected on April 14, 2022, consistent with the previous observations. This species is listed as S4 in the CNDDB or "apparently secure within California". Moreover, while (1) the CRPR rank of 4 and the S4 Rarity Ranking, (2) over 700 reported population occurrences in CalFlora statewide–substantially exceeding the minimum threshold of 100 occurrences for the S4 category, and (3) that this species is not on any official local or regional plans, there are only a few occurrences in northern Los Angeles County and is considered locally rare. Therefore, removal of the Project Site population would be considered significant under CEQA and would require mitigation. With implementation of MM 5.2-5(b), below, the impact would be reduced to a less than significant level.

Rationale For Expecting Success With Mitigation

Paniculate tarplant is an annual herb that reproduces prolifically by seed in open areas such as grasslands, disturbed areas such as roadsides, as well as in openings in coastal sage scrub. Collection of seed with hand broadcasting to suitable habitat/soils over a period of three seasons to the translocation of seed as set forth in MM 5.2-5(b) habitat by a qualified biologist or botanist as set forth in MM 5.2-5(b) below, will ensure a high probability of success for the translocation program. The paniculate tarplant

translocation program also includes a ten-year monitoring and maintenance program and contingency measures that would be implemented should translocation sites not be on a trajectory for meeting the final success criteria.

Southwestern Spiny Rush

Southwestern spiny rush was observed throughout Grasshopper Canyon, and it was estimated that several hundred individual plants exist in the Project development boundary. GLA conducted a focused survey and census in 2021 and found approximately 2,000 individuals in Grasshopper Creek. As noted, this subspecies is listed as S4 in the CNDDB or “apparently secure within California”. Moreover, while this species has the CRPR rank of 4 and the S4 Rarity Ranking, (1) over 400 reported occurrences in CalFlora statewide were observed–substantially exceeding the minimum threshold of 100 occurrences for the S4 category, and (2) this species is not on any official local or regional plans; however, there are only a few occurrences in northern Los Angeles County and it is considered locally rare. Therefore, removal of the Project Site population would be considered significant under CEQA and would require mitigation. With implementation of MM 5.2-5(c), below, the impact would be reduced to a less than significant level.

Rationale For Expecting Success With Mitigation

Southwestern spiny rush is a perennial rush that propagates from seed and vegetatively from rhizomes. Southwestern spiny rush grows along streams and also grows in areas with springs or seeps. Seed will be collected from southwestern spiny rush plants located within the impact boundaries by a qualified nursery or similar institution as set forth in MM 5.2-5(c) below. This will ensure a high probability of success for the translocation program. The collected seed will be stored for propagation of container plants. Once propagated, the container plants would be introduced to the translocation site. The southwestern spiny rush translocation program also includes a ten-year monitoring and maintenance program and contingency measures that would be implemented should translocation sites not be on a trajectory for meeting the final success criteria.

Slender Mariposa Lily and Club-Haired Mariposa Lily

BonTerra, the prior Project biologist, reported that approximately 1,709 individuals of slender/club-haired mariposa lily hybrids were observed at 36 locations on the Project Site during botanical surveys conducted in 2014; an additional 22 populations contained plants of varying densities, likely representing an additional 1,000 or more individuals. It is estimated that over 3,000 individuals occur on the Project Site. However, in the BonTerra *Draft Rare Plant Plan*, it was clarified that of the approximately 3,000 individuals observed in the Project Site, approximately 2,000 individuals are located within the Project's development boundary. Given the List 1B status and S2S3 CNDDB Rank for the slender mariposa lily and the S3 Rarity Rank for the club-haired mariposa lily and the CalFlora occurrences (95 and 117 respectively), impacts to this species would be considered significant under CEQA and mitigation would be required. With implementation of MM 5.2-4, below, the impact would be reduced to a less than significant level.

Rationale For Expecting Success With Mitigation

The slender/club-haired mariposa lilies are a short-lived perennial bulb that reproduces from seed. As set forth in MM 5.2-4, translocation will be implemented through a combination methods, including collection of existing bulbs for translocation by qualified habitat restoration specialist and seed collection with propagation by a qualified nursery or similar institution for translocation following propagation. The slender/club-haired mariposa lily translocation program also includes a ten-year monitoring and maintenance program and contingency measures that would be implemented should translocation sites not be on a trajectory for meeting the final success criteria.

Impact Conclusion and Mitigation Measures

After implementation of the recommended mitigation measures, significant impacts to Biological Resources – Rare Plants would be reduced to less than significant. CDFW has reviewed and approved the mitigation measures.

Mitigation Measures

Round-Leaved Filaree

MM 5.2-5(a) Mitigation for the round-leaved filaree shall consist of

transplantation of round-leaved filaree to a mitigation site and establishment of a self-sustaining population as set forth in the *NorthLake Castaic, Los Angeles County, California, Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* (*Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan*).[1] The *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* has been subject to review and approval by LACDRP and CDFW. A designated Project Biologist approved by the LACDRP and CDFW shall oversee its implementation. Seeds will be collected from round-leaved filaree that are located within the impact boundaries and stored for propagation of container plants to provide for introduction of propagated plants to the translocation site depicted on Exhibit 4A of the *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan*. The Mitigation Program in the *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* sets forth the following activities necessary to fully mitigate the significant impacts to the round-leaved filaree:

- A pre-grading survey shall be conducted for two seasons, prior to grading of the occupied area, during the peak flowering period (approximately March through May) by the Biological Monitor. The Biological Monitor shall clearly identify the extent of the round-leaved filaree location within the impact area with pin flags and record the extent of the population using sub-meter GPS for later collection. The pre-grading surveys shall also document the approximate coverage of native and non-native plants at the location of the population to be impacted.
- Prior to seed collection, the existing round-leaved filaree locations marked during pre-construction surveys shall be monitored every two weeks by the Biological Monitor or a qualified Seed Collector to determine when the seeds are ready for collection. The Seed Collector shall collect seeds from the plants within the collection area when the seeds are ripe. The seeds shall be cleaned and stored by a qualified nursery or an institution with appropriate storage facilities.

[1] Glenn Lukos Associates. July 2022 [Revised October and December 2022, February and April 2024]. *NorthLake Castaic, Los Angeles County, California, Special-Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* (Appendix B-2 to the RPDSEIR).

- Collected seeds, up to one half, will be used to grow a minimum of 300 plants and the remaining half will be stored to allow for contingency purposes all of which would be planted at the receptor site once performance standards are achieved.
- Receptor site or sites identified by GLA during site assessments in 2021 (see Exhibit 4A in *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan*[2]) shall be located in dedicated open space or the site will be subject to dedication with a Conservation Easement. The receptor site or sites have been shown to exhibit similar soils, associated native species, and topographical features to the impact areas.

Performance criteria have been developed in the *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* and pre-approved by the LACDRP and CDFW. In developing the performance standards for the round-leaved filaree, it is important to consider the primary goal of the plan referenced above, which is to establish a self-sustaining population of this plant consisting of the number of individuals/population size determined during pre-construction surveys. With replacement of the existing population, the impacts would be fully mitigated. This requires consideration of the following factors:

- The number of flowering individuals in any given year can vary substantially, based on environmental conditions, such that it is necessary to observe the translocated populations over a period of years to accurately determine survival and overall stability of the population. To this end, this plan proposes a ten-year monitoring term to track emergent plants along with flowering individuals which in combination provides the best and easiest indicators to track that the translocation is succeeding.
- Various threats to the plants must be minimized during the ten-year monitoring and maintenance period to ensure survival, germination, and ultimate flowering of recruited individuals, with seed set, leading to future germination/successful

[2] Glenn Lukos Associates. July 2022 [Revised October and December 2022, February and April 2024]. *NorthLake Castaic, Los Angeles County, California, Special-Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* (Appendix B-2 to the RPDSEIR).

reproduction.

- Habitat characteristics, including non-native grasses and herbaceous weeds, are important and require monitoring to determine that specific translocation/receptor sites are exhibiting a positive trajectory.

Given these considerations, the performance standards set forth below are to be achieved for the program to be considered successful. Because of the variability in the number of flowering individuals from year-to-year, the performance standards will have been achieved during at least three years of the ten-year monitoring program. Thus, the standards provide specific criteria showing that the program is on a positive trajectory. Should the performance standards be achieved early in the program, monitoring will continue for the full ten years to ensure that there is no degradation of the habitat values during the ten-year period. Thus, if the following standards are met in at least three years of the ten-year monitoring period then the program is considered successful. Program funding shall be suitably established to the County's satisfaction.

Year One Through Year Ten

- Flowering of a minimum of 100-percent of the total number of flowering plants counted during pre-construction surveys originating from container stock or seed bank. As noted, the number of container stock individuals planted or plants originating from seed following the initial establishment will equal or exceed the number impacted as determined during pre-construction surveys during at least three years of the ten-year monitoring period; and
- Habitat subject to translocation must exhibit same or less cover by non-native grasses and forbs than during the initial planting (30-percent).

<u>Contingency Plan</u>

In the event the mitigation program fails to achieve the performance standards discussed above during the ten-year monitoring period, the Project Applicant will implement the following remedial measures to attempt to achieve the performance standards:

- If the receptor site is observed to be failing significantly to achieve the performance standards during the ten-year monitoring period (e.g., flowering of

100-percent is not achieved after three years with normal or above-normal rainfall), the Biological Monitor will identify an alternate site(s) in which to install the contingency plant materials that will be propagated from the contingency seed supply held at the nursery for contingency purposes (and maintained for at least ten years). Should the performance standards be achieved, contingency plant materials will be broadcast or installed in the translocation sites, with no additional performance standards for the contingency materials.

The alternate site(s) will be prepared as outlined for the initial site and modifications incorporated as determined by the Project Biologist in coordination with LACDRP and CDFW. Once an approach has been determined in coordination with LACDRP and CDFW, the container stock would be propagated from the contingency seed and the plants would be installed at the alternate site(s) and a ten-year program, that included monitoring and maintenance, would be initiated as set forth above.

Paniculate Tarplant

MM 5.2-5(b) Mitigation for the paniculate tarplant shall consist of transplantation of paniculate tarplant by means of seed broadcasting to a mitigation site with establishment of a self-sustaining population as set forth in the *NorthLake Castaic, Los Angeles County, California, Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* (*Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan*). [3] The *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* has been subject to review and approval by LACDRP and CDFW. A designated Project Biologist approved by the LACDRP and CDFW shall oversee its implementation. Seeds will be collected from paniculate tarplant that are located within the impact boundaries and stored for introduction to the receptor site depicted on Exhibit 4A of the *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan*. The Mitigation Program in the *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* sets forth the following activities necessary to fully mitigate the

[3] Glenn Lukos Associates. July 2022 [Revised October and December 2022, February and April 2024]. *NorthLake Castaic, Los Angeles County, California, Special-Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* (Appendix B-2 to the RPDSEIR).

significant impacts to the paniculate tarplant:

- A pre-grading survey shall be conducted for two seasons during the peak flowering period (approximately June through August) by the Project Biologist. The Project Biologist shall clearly identify the extent of the paniculate tarplant location within the impact area with perimeter pin flags and sub-meter GPS for later use during seed collection. The pre-grading survey shall also document the approximate coverage of native and non-native plants at the location of the population to be impacted.
- Prior to seed collection, the existing paniculate tarplant locations marked during pre-construction surveys shall be monitored every two weeks by the Project Biologist or a qualified Seed Collector under the direction of the Project Biologist to determine when the seeds are ready for collection. The Seed Collector shall collect seeds from the plants within the collection area when the seeds are ripe. The seeds shall be cleaned and stored by a qualified nursery or an institution with appropriate storage facilities.
- One third of the collected seeds will be used to broadcast on the receptor site during an initial year and one third would be retained for the second year at the receptor site. The remaining one-third of the seed would be held for contingency purposes until performance standards are achieved. Once they are achieved, the contingency seed would be distributed into the mitigation site.
- The receptor site identified by GLA during 2021 (see Exhibit 4A in *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan*[4]) shall be located in dedicated open space or the site will be subject to dedication with a Conservation Easement. The receptor site or sites have been shown to exhibit similar soils, associated native species, and topographical features to the impact areas.

Performance criteria have been developed in the *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* and pre-approved by the

[4] Glenn Lukos Associates. July 2022 [Revised October and December 2022, February and April 2024]. *NorthLake Castaic, Los Angeles County, California, Special-Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* (Appendix B-2 to the RPDSEIR).

LACDRP (and CDFW). In developing the performance standards for the paniculate tarplant, it is important to consider the primary goal of the plan as set forth above, which is to establish a self-sustaining population of this plant consisting of the number of individuals/population size determined during the largest population number of the two years of pre-construction surveys. With replacement of the existing population, the impacts would be fully mitigated. This requires consideration of the following factors:

- The number of flowering individuals in any given year can vary substantially, based on environmental conditions, such that it is necessary to observe the translocated populations over a period of years to accurately determine survival and overall stability of the population. To this end, this plan proposes a ten-year monitoring term to track flowering individuals to confirm that the translocation is succeeding.
- Various threats to the plants must be minimized during the ten-year monitoring and maintenance period to ensure survival, germination, and ultimate flowering of recruited individuals, with seed set, leading to future germination/successful reproduction.
- Habitat characteristics including non-native grasses and herbaceous weeds are important and require monitoring to determine that specific translocation/receptor sites are exhibiting a positive trajectory.

Given these considerations, the performance standards set forth below are to be achieved for the program to be considered successful. Because of the variability in the number of flowering individuals from year-to-year, the performance standards will have been achieved during at least three years during the ten-year monitoring program. Thus, the annual standards provide specific criteria showing that the program is on a positive trajectory. Should the performance standards be achieved early in the program, monitoring will continue for the full ten years to ensure that there is no degradation of the habitat values during the ten-year period. Thus, if the following standards are met in at least three years of the ten-year monitoring period then the program is considered successful. Program funding shall be suitably established to the County’s satisfaction.

Year One Through Year Ten

- Flowering of a minimum of 100-percent of the total number of flowering plants counted during the larger of the two years during which pre-construction monitoring was conducted. This would be achieved during at least three years of the ten-year monitoring period); and
- Habitat subject to translocation must exhibit same or less cover by non-native grasses; and forbs than during the initial planting (30-percent).

Contingency Plan

In the event the mitigation program fails to achieve the performance standards discussed above during the ten-year monitoring period, the Project Applicant will implement the following remedial measures to attempt to achieve the performance standards:

- If the receptor site is observed to be failing significantly to achieve the performance standards during the ten-year monitoring period (e.g., flowering of 100-percent is not achieved after three years with normal or above-normal rainfall), the Biological Monitor will identify an alternate site(s) in which to install the contingency seed held at the nursery for contingencies purposes (and maintained for at least ten years). Should the performance standards be achieved, contingency plant materials will be broadcast or installed in the translocation sites, with no additional performance standards for the contingency materials.

The alternate site(s) will be prepared as outlined for the initial site and modifications incorporated as determined by the Project Biologist in coordination with LACDRP and CDFW. Once an approach has been determined in coordination with LACDRP and CDFW, contingency seed would be installed at the alternate site(s) and a ten-year program, that included monitoring and maintenance would be initiated as set forth above.

Southwestern Spiny Rush

MM 5.2-5(c) Mitigation for the southwestern spiny rush includes two components to ensure long-term persistence of southwestern spiny rush in northern Los Angeles County. Mitigation includes 1) preservation of streambed habitat within Marple

Canyon that contains 523 individuals of the spiny rush, and 2) planting of southwestern spiny rush at a mitigation site with establishment of a self-sustaining population as set forth in the *NorthLake Castaic, Los Angeles County, California, Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* (*Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan)*.[5] The *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* has been subject to review and approval by LACDRP and CDFW. A designated Project Biologist approved by the LACDRP and CDFW shall oversee its implementation. Seed will be collected from southwestern spiny rush plants located within the impact boundaries. The collected seed will be stored for propagation of container plants. Once propagated, the container plants would be introduced to the translocation site depicted on Exhibit 4B of the *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan.* The Mitigation Program in the *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* sets forth the following activities necessary to fully mitigate the significant impacts to the southwestern spiny rush:

- A pre-grading survey shall be conducted during a single season during the peak flowering period (approximately March through May) by the Biological Monitor. The Biological Monitor shall identify the extent of the southwestern spiny rush location within the impact area using sub-meter GPS for later seed collection.
- Prior to seed collection, the existing southwestern spiny rush locations marked during pre-construction surveys shall be monitored every two weeks by the Biological Monitor or a qualified Seed Collector to determine when the seeds are ready for collection. The Seed Collector shall collect seeds from the plants within the collection area when the seeds are ripe. The seeds shall be cleaned and stored by a qualified nursery or an institution with appropriate storage facilities.
- Collected seeds will be used to grow a minimum of 600 plants to allow for contingency purposes all of which would be planted at the receptor site. Half of

[5] Glenn Lukos Associates. July 2022 [Revised October and December 2022, February and April 2024]. *NorthLake Castaic, Los Angeles County, California, Special-Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* (Appendix B-2 to the RPDSEIR).

the seed collected will be retained by the nursery for additional propagation as a contingency measure.

- Receptor site or sites identified by GLA during site assessments in 2021 (see Exhibit 4B in *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan*[6]) shall be located in dedicated open space or the site will be subject to dedication with a Conservation Easement. The receptor site or sites have been shown to exhibit similar soils, associated native species, and topographical features to the impact areas.

Performance criteria have been developed in the *Special Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* and pre-approved by the LACDRP and CDFW. In developing the performance standards for the southwestern spiny rush, it is important to consider the primary goal of the plan as set forth above, which is to provide for a combination of preservation and establishment of a self-sustaining population of this plant consisting of the 300 individuals, which in combination of the preservation in Marple Canyon would mitigate impacts to this species. In order to achieve survival of 200 plants within Grasshopper Creek, 300 individuals will be planted initially to allow for natural attrition. With the combined preservation and replacement of the existing population, the impacts would be fully mitigated. This requires consideration of the following factors:

- Southwestern spiny rush is a perennial plant and the number of flowering individuals in any given year does not vary substantially. However, based on environmental conditions, it is not expected that populations change significantly over the period of years needed to accurately determine survival and overall stability of the population. To this end, this plan proposes a ten-year monitoring term to track the existing population within Marple Canyon along with established individuals in Grasshopper Creek to determine progress.
- Various threats to the plants established within Grasshopper Creek must be minimized during the ten-year monitoring and maintenance period to ensure

[6] Glenn Lukos Associates. July 2022 [Revised October and December 2022, February and April 2024]. *NorthLake Castaic, Los Angeles County, California, Special-Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* (Appendix B-2 to the RPDSEIR).

survival, germination, and ultimate flowering of planted and recruited individuals, with seed set, leading to future germination/successful reproduction.

- Habitat characteristics including non-native grasses and herbaceous weeds are important and require monitoring to determine that specific translocation/receptor sites are exhibiting a positive trajectory.

Given these considerations, the performance standards set forth below are to be achieved for the program to be considered successful. Because of the expected stability in the number of flowering individuals from year-to-year, the performance standards will have been achieved at the end of the ten-year monitoring program. Thus, the annual standards provide a guide showing that the program is on a positive trajectory. Should the performance standards be achieved early in the program, monitoring will continue for the full ten years to ensure that there is no degradation of the habitat values during the ten-year period. Thus, if the following standards are met in at least three years of the ten-year monitoring period then the program is considered successful. Program funding shall be suitably established to the County's satisfaction.

Marple Canyon Year One Through Year Ten

- Persistence of Marple Canyon population totaling 523 individuals with no more than ten-percent reduction due to such factors such as drought. Thus, there would be a minimum of 471 individuals at the end of the ten-year monitoring period.

Grasshopper Creek Year One

- Survival of 80-percent of the 200 established individuals.
- Following quantitative monitoring that will occur between March and June, the number of additional container stock needed to provide for establishment of 200 plants will be determined with planting to following during fall of the same year.

Grasshopper Creek Year Two

- Survival of 90-percent of the 200 established individuals.
- Following quantitative monitoring that will occur between March and June, the number of additional container stock needed to provide for establishment of 200 plants will be determined with planting to following during fall of the same year.

Grasshopper Creek Year Three through Ten

- Survival of 100-percent of the 200 established individuals.
- Following quantitative monitoring that will occur between March and June, the number of additional container stock needed to provide for establishment of 200 plants will be determined with planting to following during fall of the same year.

Contingency Plan

In the event the mitigation program fails to achieve the performance standards discussed above during the ten-year monitoring period, the Project Applicant will implement the following remedial measures to attempt to achieve the performance standards:

- If the Grasshopper Creek receptor site is observed to be failing significantly to achieve the performance standard during the ten-year monitoring period (e.g., survival of 100-percent of 200 established individuals is not achieved by the end of ten years), the Biological Monitor will identify an alternate site(s) in which to install the contingency plant materials that will be propagated from the contingency seed supply held at the nursery for the (and maintained for at least ten years). Should the performance standards be achieved, contingency plant materials will be broadcast or installed in the translocation sites, with no additional performance standards for the contingency materials.

The alternate site(s) will be prepared as outlined for the initial site and modifications incorporated as determined by the Project Biologist in coordination with LACDRP and CDFW. Once an approach has been determined in coordination with LACDRP and CDFW, the container stock would be propagated from the contingency seed and the plants would be installed at the alternate site(s) and a ten-year program, that included monitoring and maintenance, would be initiated as set forth above.

Slender Mariposa Lily and Club-Haired Mariposa Lily

MM 5.2-4 Mitigation for the club-haired mariposa lily and the slender mariposa lily shall consist of transplantation of lilies to a mitigation site and establishment of a self-sustaining population as set forth in the *NorthLake Castaic, Los Angeles County, California, Special-Status Plants Impact Assessment and Habitat Mitigation and Monitoring Plan* (*Special Status Plant Impact Assessment and Habitat Mitigation*

and Monitoring Plan).[7] The *Special-Status Plants Impact Assessment and Habitat Mitigation and Monitoring Plan* has been subject to review and approval by LACDRP and CDFW. A designated Project Biologist approved by the LACDRP and CDFW shall oversee its implementation. Seeds will be collected from lilies that are located within the impact boundaries and bulbs will be subsequently excavated and stored for later transplantation to the translocation site depicted on Exhibit 5 of the *Special-Status Plants Impact Assessment and Habitat Mitigation and Monitoring Plan*. The Mitigation Program in the *Special-Status Plants Impact Assessment and Habitat Mitigation and Monitoring Plan* sets forth the following activities necessary to fully mitigate the significant impacts to the club-haired mariposa lily and the slender mariposa lily:

- A pre-grading survey shall be conducted for two seasons following emergence of leaves and during the peak flowering period (approximately March through June) by the Biological Monitor. The Biological Monitor shall clearly identify each lily location within the impact area with a pin flag for later collection. The pre-grading survey shall also document the approximate coverage of native and non-native plants at each lily population to be impacted.
- Prior to seed collection, the existing lily locations marked during pre-construction surveys shall be monitored every two weeks by the Biological Monitor or a qualified Seed Collector to determine when the seeds are ready for collection. The Seed Collector shall collect seeds from the plants within the collection area when the seeds are ripe. The seeds shall be cleaned and stored by a qualified nursery or an institution with appropriate storage facilities.
- Individual lily bulbs shall be excavated and collected following the seed collection and once the bulbs have entered their winter dormancy period (approximately September 1). The bulbs shall be stored by a qualified nursery or institution with appropriate storage facilities and all non-target bulbiferous species shall be discarded.

[7] Glenn Lukos Associates. July 2022 [Revised October and December 2022, February and April 2024]. *NorthLake Castaic, Los Angeles County, California, Special-Status Plant Impact Assessment and Habitat Mitigation and Monitoring Plan* (Appendix B-2 to the RPDSEIR).

- A portion of the collected seeds will be used to grow 500 slender/club-haired mariposa lilies for contingency purposes and stored a native plant nursery until needed as determined by the project biologist.
- Receptor site or sites identified in BonTerra's *Feasibility Analysis of NorthLake Biological Mitigation Requirements* and refined by GLA (as shown on Exhibit 5 of the *Special-Status Plants Impact Assessment and Habitat Mitigation and Monitoring Plan*) shall be located in dedicated open space or the site will be subject to dedication with a Conservation Easement. The receptor site or sites have been shown to exhibit similar soils, associated native species, and topographical features to the impact areas.
- Receptor sites on lands currently owned by NorthLake will be managed by SMMC or other approved entities. Prior to commencing the actions set forth in this plan, the applicant shall submit final agreements to CDFW and the County with the acceptable entities that will hold the Conservation Easement(s) (CE) and provide long-term management.
- Funding for this measure shall be suitably established to the County's satisfaction.
- Performance criteria have been developed in the *Special-Status Plants Impact Assessment and Habitat Mitigation and Monitoring Plan,* dated February 2023, and pre-approved by the LACDRP and CDFW. The performance criteria shall address (1) native and non-native plant coverage requirements (mitigation site conditions should be consistent with lily populations in the impact area) and (2) percentage of lilies that exhibit emergent leaves that that bloom each year as follows (because the salvaged plantings will be phased over a three-year period as described above, the monitoring period would be ten years for each phase or a minimum of 13 years beginning from the start of phase 1. As set forth in Table 3 of the of the *Special-Status Plants Impact Assessment and Habitat Mitigation and Monitoring Plan*, under the phased translocation, 40-percent of plants would be translocated in year 1, 40-percent in year 2 and 20-percent in year 3):

Year One

- Emergence of leaves of a minimum of 70-percent of the translocated bulbs
- Flowering of a minimum of 50-percent of the translocated bulbs
- Habitat subject to translocation must exhibit same or less cover by non-native grasses and forbs than during the initial plot identification; and
- No evidence of herbivory

Year Two

- Emergence of leaves of a minimum of 60-percent of the translocated bulbs
- Flowering of a minimum of 40-percent of the translocated bulbs
- Habitat subject to translocation must exhibit same or less cover by non-native grasses and forbs than during the initial plot identification; and
- No evidence of herbivory

Year Three

- Emergence of leaves of a minimum of 50-percent of the translocated bulbs
- Flowering of a minimum of 30-percent of the translocated bulbs
- Habitat subject to translocation must exhibit same or less cover by non-native grasses and forbs than during the initial plot identification; and
- No evidence of herbivory

Year Four

- Emergence of leaves of a minimum of 50-percent of the translocated bulbs
- Flowering of a minimum of 30-percent of the translocated bulbs
- Habitat subject to translocation must exhibit same or less cover by non-native grasses and forbs than during the initial plot identification; and
- No evidence of herbivory

Year Five

- Emergence of leaves of a minimum of 60-percent of the translocated bulbs
- Flowering of a minimum of 40-percent of the translocated bulbs
- Habitat subject to translocation must exhibit same or less cover by non-native grasses and forbs than during the initial plot identification; and
- No evidence of herbivory

Year Six

- Emergence of leaves of a minimum of 70-percent of the translocated bulbs
- Flowering of a minimum of 50-percent of the translocated bulbs
- Habitat subject to translocation must exhibit same or less cover by non-native grasses and forbs than during the initial plot identification; and
- No evidence of herbivory

Year Seven

- Emergence of leaves of a minimum of 70-percent of the translocated bulbs
- Flowering of a minimum of 50-percent of the translocated bulbs
- Habitat subject to translocation must exhibit same or less cover by non-native grasses and forbs than during the initial plot identification; and
- No evidence of herbivory

Year Eight

- Emergence of leaves of a minimum of 80-percent of the translocated bulbs
- Flowering of a minimum of 60-percent of the translocated bulbs
- Habitat subject to translocation must exhibit same or less cover by non-native grasses and forbs than during the initial plot identification; and
- No evidence of herbivory

Year Nine

- Emergence of leaves of a minimum of 90-percent of the translocated bulbs
- Flowering of a minimum of 70-percent of the translocated bulbs
- Habitat subject to translocation must exhibit same or less cover by non-native grasses and forbs than during the initial plot identification; and
- No evidence of herbivory

Year Ten

- Emergence of leaves of a minimum of 100-percent of the translocated bulbs
- Flowering of a minimum of 70-percent of the translocated bulbs
- Habitat subject to translocation must exhibit same or less cover by non-native grasses and forbs than during the initial plot identification; and
- No evidence of herbivory

The monitoring shall be conducted for ten years (for each phase) from installation of the translocated bulbs or from installation of container plants. As noted, this could result in two separate and unrelated ten-year monitoring efforts, including one that originates with bulb installation and a subsequent effort that begins with container stock installation. If the performance standards are not being met during the first year, additional measures may be suggested as determined appropriate by the Project Biologist as set forth in the Contingency Plan set forth in the *Special-Status Plants Impact Assessment and Habitat Mitigation and Monitoring Plan* as set follows:

- If any of the translocation/receptor sites are observed to be failing significantly to achieve the performance standard during the ten-year monitoring period, the Biological Monitor will identify an alternate site(s) in which to install the contingency plant materials that will be stored at a nursery for the first year of the program.
- If the receptor sites appear on track to meet the performance standards no sooner than year seven of the monitoring and maintenance period, the remaining plant material may be planted at the receptor sites (if space allows) or additional acceptable receptor sites will be identified.
- Seeds and/or bulbs will continue to be harvested from lilies maintained in the nursery and installed in the receptor sites on an as-needed basis to ensure receptor sites are progressing toward final performance.
- If the receptor sites fail to achieve the performance standards by the tenth year of the program, the monitoring period may be extended if the Project Biologist in consultation with LACDRP and CDFW, determines that the site is continuing to progress and can ultimately achieve the performance standards. Alternatively, if it is determined that a particular receptor site is not able to meet performance standards, then additional receptor sites will be identified to make up the difference. Thus, for example, if a receptor site received 500 bulbs, at the 80-percent success criteria it must have 400 emergent plants or 300 flowering plants to be successful. If the site only exhibits 40-percent emergent plants and 30-percent of flowering Mariposa lilies, then the site would be credited with the partial success achieved and an additional site where the shortfall could be made

up would be identified.

- Potential seed sources from additional donor sites shall also be identified in case it becomes necessary to collect additional seed for use on the site following performance of remedial measures.

3. Biological Resources - CBB

Potential Effect

The development and operation of the Project could impact the CBB.

Finding

With implementation of the mitigation measure identified in the RPDSEIR, potential impacts to CBB would be reduced to a less than significant level during construction and operation of the Project.

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen potential significant environmental effects on CBB, and the Project's biological resources impacts on CBB would be less than significant.

Facts

The Project is already required to provide mitigation for Coastal Sage Scrub and other flowering resources. Coastal Sage Scrub and other flowering resource mitigation is more than adequate for CBB. In fact, Coastal Sage Scrub is the preferred habitat for CBB. Mitigation of flowering resources at a 2:1 ratio exceeds what CDFW requires for CBB mitigation. Based on areas of suitable habitat, the Project would provide 337.55 acres of mitigation within the onsite conservation areas and 156.7 acres of conservation on adjacent NorthLake ownership for a total of 492.2 acres of preservation. (Exhibit 3 to the CBB Survey Report.) Thus, based on impacts to up to 1,001.8 acres of suitable habitat that supports or potentially supports CBB, the mitigation ratio of 2:1 would be 2,003.6 acres. To achieve 2:1 mitigation, NorthLake will provide approximately 337.5 acres onsite, 156.7 acres on NorthLake-owned offsite property, and obtain 1,509.4 acres from a CDFW-approved mitigation bank or through purchase and long-term conservation of suitable habitat, or a combination of the two options to account for the remainder. Appendix B to the CBB Survey Memo (Feasibility Analysis of NorthLake Biological Resources Contributors, Attachment 2, Table 3, Top 20 High Scoring Parcels

from Regional Analysis) is a Mitigation Feasibility Assessment that includes candidate properties with suitable habitat such as Coastal Sage Scrub, chaparral, and native grasslands that contain suitable habitat for CBB.

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen potential significant environmental effects on CBB to less than significant levels.

Project grading will impact the following vegetation alliances that support or could potentially support CBB based on the presence of suitable floral resources.

Sage Scrub Communities

Project implementation would impact a total of 634.70 acres of sage scrub, including Purple sage scrub, California sagebrush–California buckwheat scrub, Black sage scrub, California sagebrush–California buckwheat scrub/Foothill needlegrass grassland, California sagebrush–California buckwheat scrub/California annual grassland, and the burned sage scrub areas: burned Purple sage scrub, burned California sagebrush–California buckwheat scrub, burned Black sage scrub, and burned California sagebrush–California buckwheat scrub/California annual grassland. Impacts on these vegetation types would be considered significant due to the loss of this vegetation type in southern California and the potential for this habitat to support special status species.

Native Grassland Communities

A total of 24.23 acres of Foothill needlegrass grassland and burned Foothill needle grass grassland would be impacted by Project implementation. Impacts on this vegetation type would be considered significant due to the limited distribution of this vegetation type in California.

California Annual Grassland/Wildflower Fields

A total of 342.85 acres of California annual grassland/Wildflower fields would be impacted by Project implementation. Impacts on California annual grassland/Wildflower fields would be considered adverse and potentially significant because of the density and diversity of native plants found in this vegetation type and because of the general lack of similar areas in the Project vicinity.

Based on the detection of CBB within the NorthLake development area, it is expected that an Incidental Take Permit will be needed to authorize incidental take of CBB during grading. Mitigation for direct impacts to CBB and associated habitat will be fulfilled through compensatory mitigation at a minimum 2:1 suitable habitat that provides replacement of equal functions and values to those impacted by the NorthLake project, or as otherwise determined through the Incidental Take Permit process. Mitigation will be accomplished either through a combination of onsite conservation, offsite conservation on adjacent NorthLake owned lands, and/or through a CDFW-approved mitigation bank. If mitigation is not purchased through a mitigation bank, and lands are conserved separately, a cost estimate will be prepared to estimate the initial start-up costs and ongoing annual costs of management activities for the management of the conservation easement area(s) in perpetuity. The funding source will be in the form of an endowment to help the qualified natural lands management entity that is ultimately selected to hold the conservation easement(s). The endowment amount will be established following the completion of a project-specific Property Analysis Record to calculate the costs of in-perpetuity land management. The Property Analysis Record will consider all management activities required in the Incidental Take Permit to fulfill the requirements of the conservation easement(s), which are currently in review and development.

Based on areas of suitable habitat, the Project would provide 337.55 acres of mitigation within the onsite conservation areas and 156.7 acres of conservation on adjacent NorthLake ownership for a total of 494.25 acres of preservation. (Exhibit 3 to the CBB Survey Report.) Thus, based on impacts to up to 1,001.8 acres of suitable habitat which supports or potentially supports CBB, the mitigation ratio of 2:1 would be 2,003.6 acres. To achieve 2:1 mitigation, NorthLake will provide approximately 337.5 acres onsite, 156.7 acres on NorthLake-owned offsite property, and obtain 1,509.4 acres from a CDFW-approved mitigation bank or through purchase and long-term conservation of suitable habitat, or a combination of the two options to account for the remainder. Appendix B to the CBB Survey Memo (Feasibility Analysis of NorthLake Biological Resources Contributors, Attachment 2 [Table 3, Top 20 High Scoring Parcels from Regional Analysis]) is a Mitigation Feasibility Assessment that includes candidate

properties with suitable habitat such as coastal sage scrub, chaparral, and native grasslands that contain suitable habitat for CBB.

The proposed mitigation will correspond to the requirements of the NorthLake Specific Plan Final Supplemental EIR (FSEIR) that were set forth in the previous approvals. With the implementation of the previously approved proposed mitigation set forth below, significant impacts on CBB would be reduced to less-than-significant consistent with the FSEIR measures excerpted below.

Rationale For Expecting Success With Mitigation

Regarding the mitigation, it is important to note that for a recently issued Incidental Take Permit for CBB, the CDFW required a ratio of 1.5:1, consisting of a combination of restoration and enhancement. The preservation of Open Space Mitigation Areas, including onsite areas and adjacent offsite areas owned by NorthLake plus purchase of suitable habitat in a mitigation bank or other approved lands determined in coordination with CDFW results in conservation of substantial areas of high-quality chaparral and coastal sage scrub and other habitat types that are both suitable for and occupied by the CBB at a 2:1 ratio, exceeding the amount required for the Incidental Take Permit referenced above.

Impact Conclusion and Mitigation Measures

The previously approved Project is already required to provide mitigation for coastal sage scrub and other flowering resources as set forth below. Coastal sage scrub and other flowering resource mitigation is more than adequate for the CBB. In fact, coastal sage scrub is the preferred habitat for CBB. As set forth above, mitigation of flowering resources at a 2:1 ratio exceeds what CDFW requires for the CBB. Based on areas of suitable habitat, the Project would provide 337.55 acres of mitigation within the onsite conservation areas and 156.7 acres of conservation on adjacent NorthLake ownership for a total of 492.2 acres of preservation. (Exhibit 3 to the CBB Survey Report.) Thus, based on impacts to up to 1,001.8 acres of suitable habitat that supports or potentially supports CBB, the mitigation ratio of 2:1 would be 2,003.6 acres. To achieve 2:1 mitigation, NorthLake will provide approximately 337.5 acres onsite, 156.7 acres on NorthLake-owned offsite property, and obtain 1,509.4 acres from a CDFW approved mitigation bank or through purchase and long-term conservation of suitable habitat, or a

combination of the two options to account for the remainder. Appendix B to the CBB Survey Memo (Feasibility Analysis of NorthLake Biological Resources Contributors, Attachment 2, Table 3, Top 20 High Scoring Parcels from Regional Analysis) is a Mitigation Feasibility Assessment that includes candidate properties with suitable habitat such as coastal sage scrub, chaparral, and native grasslands that contain suitable habitat for CBB.

Mitigation Measures

Coastal Sage Scrub

MM 5.2-6

The loss of sage scrub habitat within the impact area is considered a significant impact. Sage scrub habitat shall be preserved, restored, or enhanced on site and/or off site at a ratio to be determined by the County of Los Angeles Department of Regional Planning (LACDRP), but shall be no less than 2:1 for habitat restoration, enhancement or preservation, or combination thereof. A total of 634.70 acres of sage scrub would be impacted by Project implementation, which includes Purple sage scrub, California sagebrush–California buckwheat scrub, Black sage scrub, California sagebrush–California buckwheat scrub/Foothill needlegrass grassland, California sagebrush–California buckwheat scrub/California annual grassland, and the burned sage scrub areas: burned Purple sage scrub, burned California sagebrush–California buckwheat scrub, burned Black sage scrub, and burned California sagebrush–California buckwheat scrub/California annual grassland. Habitat restoration is the creation of native target habitat that does not currently exist; enhancement is the improvement of existing, disturbed native habitat areas through the removal of exotic plant species, the addition of native plants and/or seeds, or other measures. Preservation is conservation of existing habitat that exhibits the functions needed to support target species such as the CBB. The mitigation ratio for habitat restoration, enhancement, and preservation shall depend on the initial quality of the habitat area to be restored, enhanced or preserved and would be determined by the Project Applicant and the LACDRP. Sage scrub habitat restoration/enhancement implementation shall begin not more than one year following project impacts to this habitat type. Where restoration or enhancement is the proposed mitigation, the Project Applicant shall develop a Habitat Mitigation and Monitoring

Program (HMMP) and shall submit it to the LACDRP and the California Department of Fish and Wildlife (CDFW) for review and approval. The HMMP shall be developed by a qualified restoration ecologist, submitted for review and approval to the LACDRP prior to the issuance of grading permits, and shall be implemented by a qualified restoration ecologist and a qualified restoration contractor (as defined below). Habitat restoration/enhancement will consist of seeding and/or installing container plants of suitable sage scrub species. If it is ecologically appropriate for the selected mitigation site (e.g., soil types), Peirson's morning-glory will be incorporated into the restoration/enhancement planting and/or seeding palettes. The Project Applicant shall implement the HMMP as approved by the LACDRP and CDFW and according to its specified materials, methods, and performance criteria, which shall include the following items

a. Responsibilities and Qualifications. The responsibilities and qualifications of the Project Applicant, ecological specialists, and restoration (landscape) contracting personnel who will implement the plan shall be specified. At a minimum, the HMMP shall specify that the ecological specialists and contractors have performed successful installation and long-term monitoring and maintenance of southern California native habitat mitigation/restoration programs, implemented under LACDRP mitigation measures and/or State or federal natural resource agency permit conditions. A successful program shall be defined as one that has been signed off on by the LACDRP and/or a State or federal natural resource agency.
b. Performance Criteria. Mitigation performance criteria to be specified in the HMMP shall include native vegetation percent coverage and diversity (minimum), non-native vegetation percent coverage (maximum), and the cessation of irrigation a minimum of two years prior to eligibility for sign-off. The HMMP shall state that the use of the mitigation site by special status wildlife species (e.g., coastal California gnatcatcher), though not a requirement for site success, would be regarded by the LACDRP as a significant factor in considering eligibility for program sign-off.

c. Site Selection. The mitigation sites shall be determined in coordination with the Project Applicant and the LACDRP. The site(s) shall be located in dedicated open space areas (or areas available for dedication), and shall be contiguous with other natural open space areas. Mitigation sites include onsite, NorthLake-owned offsite property, and obtaining acres from a CDFW-approved mitigation bank or through purchase and long-term conservation of suitable habitat, including areas where restoration or enhancement is needed, or a combination of the two options to account for the remainder. The Project Applicant shall demonstrate acquisition of suitable lands for restoration, enhancement, or preservation prior to issuance of the Project grading permit.
d. Native Plant and Seed Materials Procurement. For restoration or enhancement, at least three years prior to mitigation implementation, the Project Applicant or its consultants/contractors shall initiate collection of the native seed materials specified in the HMMP. All seed mixes shall be of local origin: i.e., collected within 30 miles, and within the same Watershed (Santa Clara River Watershed), as the selected restoration/enhancement site(s), to ensure genetic integrity. All container plants shall be propagated from seed of local origin as defined above. No plant or seed materials of unknown or non-local geographic origin shall be used. Seed collection shall be prioritized according to habitat area, in the' following order: (a) project impact areas (highest priority); (b) other on-site habitat areas; and (c) off-site habitat areas (lowest priority), assuming availability of seed species in multiple locations.
e. Wildlife Surveys and Protection. The HMMP shall specify any wildlife surveys (i.e., nesting bird surveys, focused/protocol surveys for special status species [e.g., coastal California gnatcatcher]) and biological monitoring that are required to avoid adverse impacts to wildlife species during the performance of mitigation site preparation, installation, or maintenance tasks. The HMMP shall also describe potential restrictions on these management tasks due to sensitive wildlife conditions on the mitigation site (e.g., suspension of these tasks during the nesting bird season, as defined in project permits).

f. Site Preparation and Plant Materials Installation. For restoration or enhancement, mitigation site preparation shall include, as necessary (a) protection of existing native species and habitats (including compliance with seasonal restrictions, if any); (b) installation of protective fencing and/or signage (as needed); (c) initial trash and weed removal (outside the nesting bird season) and methods; (d) soil treatments, as needed (i.e., imprinting, decompacting); (e) installation of erosion-control measures (i.e., fully natural/bio-degradable [not 'photodegradable'] fiber roll); (f) application of salvaged native plant materials (i.e., duff) as available, and supervised by a biological monitor, (g) temporary irrigation installation; (h) a minimum one-year preliminary weed abatement program (prior to the installation of native plant and seed materials including specification of approved herbicides); (i) planting of container species; and (j) seed mix application.

g. Schedule. An implementation schedule shall be developed for restoration or enhancement, that includes planting and seeding to occur in late fall and early winter (i.e., between November 1 and December 31) and the frequency of long-term maintenance and monitoring activities (including the dates of annual quantitative surveys, as described below).

h. Maintenance Program. The Maintenance Program for restoration or enhancement shall include (a) protection of existing native species and habitats (including compliance with seasonal restrictions, if any); (b) maintenance of protective fencing and/or signage; (c) trash and weed removal-including specification of approved herbicides; (d) maintenance of erosion-control measures; (e) inspection/repairs of irrigation components; (f) replacement of dead container plants (as needed); (g) application of remedial seed mixes (as needed); (h) herbivory control; and (i) removal of all non-vegetative materials (i.e., fencing, signage, irrigation components) upon project completion. The mitigation site shall be maintained for a period of five years to ensure the successful sage scrub habitat establishment within the restored/enhanced sites; however, the Project Applicant may request to be

released from maintenance requirements by the LACDRP prior to five years if the mitigation program has achieved all performance criteria.

i. Monitoring Program. The Monitoring Program for restoration or enhancement shall include (a) qualitative monitoring (i.e., general habitat conditions, photo-documentation from established photo stations); (b) quantitative monitoring (e.g., randomly placed point-intercept transects); (c) annual monitoring reports, which shall be submitted to the LACDRP for five years or until project completion; and (d) wildlife surveys and monitoring as described above. The annual monitoring reports shall include a detailed discussion of mitigation site performance (e.g., measured vegetation coverage and diversity) and compliance with required performance criteria, a discussion of wildlife species' use of the restored and/or enhanced habitat area(s), and a list of proposed remedial measures to address non-compliance with any performance criteria. The site shall be monitored for five years or until the Project Applicant has been released from maintenance requirements by the LACDRP.

j. Long-term preservation. Long-term preservation of the sites shall be outlined in the HMMP to ensure that the mitigation sites are not impacted by future development. A conservation easement and a performance bond shall be secured prior to implementation of the mitigation program.

Grassland/Wildflower field

- **MM 5.2-7** The loss of California annual grassland/wildflower fields within the impact area is considered to be a significant impact. California annual grassland/wildflower fields shall be preserved, restored, or enhanced on site and/or off site at a ratio to be determined by the County of Los Angeles Department of Regional Planning (LACDRP), but the ratio shall be no less than 2:1 for habitat restoration, enhancement, or preservation or combination thereof. A total of 24.23 acres of Foothill needlegrass grassland and burned Foothill needle grass grassland would be impacted by Project implementation. Habitat restoration is the creation of native target habitat that does not currently exist; enhancement is the improvement of existing, disturbed native habitat areas

through the removal of exotic plant species, the addition of native plants and/or seeds, or other measures. Preservation is conservation of existing habitat that exhibits the functions needed to support target species such as the CBB. The mitigation ratio for habitat restoration, enhancement, or preservation shall depend on the initial quality of the habitat area to be restored, enhanced, or preserved and would be determined by the project applicant and the LACDRP. The mitigation ratio shall also be no less than 6.5 acres of habitat preserved/restored per burrowing owl location impacted (individual or pair using the same burrows) or greater than 6.5 acres of habitat enhancement per burrowing owl location impacted, depending on the ratio applied to the enhancement site(s). California annual grassland/wildflower fields habitat restoration/enhancement implementation shall begin not more than one year following project impacts to this habitat type. The project applicant shall develop a HMMP and shall submit It to the LACDRP for review and approval. The HMMP shall be developed by a qualified restoration ecologist submitted for review and approval to the LACDRP and LACDRP and the California Department of Fish and Wildlife (CDFW) prior to issuance of grading permits, and shall be implemented by a qualified restoration ecologist and a qualified restoration contractor (as defined below). The HMMP shall also provide mitigation for the loss of burrowing owl habitat; therefore, mitigation site selection criteria shall include the suitability of the potential site(s) for burrowing owls. Habitat restoration/enhancement shall consist of seeding of suitable California annual grassland/wildflower fields plant species. If it is ecologically appropriate for the selected mitigation site (e.g., soil type), Peirson's morning-glory will be incorporated into the restoration/enhancement palette. The Project Applicant shall implement the HMMP as approved by the LACDRP and CDFW and according to its specified materials, methods, and performance criteria, which shall include the following items:

- The responsibilities and qualifications of the project applicant, ecological specialists, and restoration (landscape) contracting personnel who will implement the plan shall be specified. At a minimum, the HMMP shall

specify that the ecological specialists and contractors have performed successful installation and long-term monitoring and maintenance of southern California native habitat mitigation/restoration enhancement programs, implemented under LACDRP mitigation measures or State and/or federal natural resource agency permit conditions. A successful program shall be defined as one that has been signed off on by the LACDRP and/or a State or federal natural resource agency.

- Mitigation performance criteria to be specified in the HMMP shall include native vegetation percent coverage and diversity (minimum), non-native vegetation percent coverage (maximum), and the cessation of irrigation a minimum of two years prior to eligibility for sign-off. The performance criteria shall reflect the habitat requirements for burrowing owls; i.e., grassland habitat with vegetation gaps or areas of lower vegetation coverage. The HMMP shall state that the establishment of burrowing owls, and/or special status plant species (e.g., Peirson's morning-glory), though not a requirement for site success, would be regarded by the LACDRP as a significant factor in considering eligibility for program.
- The mitigation sites shall be determined in coordination with the project applicant and the LACDRP. The site(s) shall be (1) located in dedicated open space areas or areas available for dedication as open space, and shall be contiguous with other natural open space areas; (2) configured to provide maximum habitat values for burrowing owls and other wildlife species; e.g., opportunities for escape and refuge from stochastic events such as fire, flood, etc.; (3) consist of level or gently sloping terrain, soil types, and microhabitat conditions suitable for occupation by the burrowing owl as determined by a qualified Biologist; and (4) include, to the extent feasible. soil types and microhabitat conditions suitable for the special status plant species listed above.
- At least two years prior to mitigation plant and seed installation associated with restoration of enhancement, the Project Applicant or its consultants/contractors shall initiate collection of the native seed materials

specified in the HMMP. All seed mixes shall be of local origin; i.e., collected within 30 miles, and within the same Watershed (Santa Clara River Watershed), as the selected restoration/enhancement site(s), to ensure genetic integrity. No seed materials of unknown or non-local geographic origin shall be used. Seed collection shall be prioritized according to habitat area, in the following order: (a) project impact areas (highest priority); (b) other on-site habitat areas; and (c) off-site habitat areas (lowest priority), assuming availability of seed species in multiple locations.

- The HMMP shall specify any wildlife surveys (i.e., nesting bird surveys, focused/protocol surveys for special status species [e.g., burrowing owl]) and biological monitoring that are required to avoid adverse impacts to wildlife species during the performance of mitigation site preparation, installation, or maintenance tasks. Specifically, the HMMP shall specify the performance of wintering and breeding season surveys for burrowing owls, to determine the species' occupation of the mitigation site(s). The HMMP shall also describe potential restrictions on these tasks due to sensitive wildlife conditions on the mitigation site (e.g., suspension of these tasks during the nesting bird season, as defined in project permits).
- For restoration or enhancement, mitigation site preparation shall include (a) protection of existing native species and habitats (including compliance with seasonal restrictions, if any); (b) installation of protective fencing and/or signage (as needed); (c) initial trash and weed removal (outside the nesting bird season) and methods; (d) soil treatments, as needed (i.e., imprinting, de-compacting); (e) installation of erosion-control measures (i.e., fully natural/bio-degradable [not 'photo-degradable'] fiber roll); (f) temporary irrigation installation; (g) a minimum one-year preliminary weed abatement program (prior to the installation of native plant and seed materials)--including specification of approved herbicides; and (g) seed mix application. Mitigation site preparation and installation shall reflect the

habitat requirements for burrowing owls; i.e., grassland habitat with vegetation gaps or areas of lower vegetation coverage.

- An implementation schedule shall be developed that includes seeding to occur in late fall and early winter (i.e., between November 1 and December 31) and the frequency of long-term maintenance and monitoring activities (including the dates of annual quantitative surveys, as described below).
- The Maintenance Program for restoration or enhancement shall include (a) protection of existing native species and habitats (including compliance with seasonal restrictions, if any); (b) maintenance of protective fencing and/or signage; (c) trash and weed removal-including specification of approved herbicides; (d) maintenance of erosion control measures; (e) inspection/repairs of irrigation components; (f) application of remedial seed mixes (as needed); (g) herbivory control; and (h) removal of all non-vegetative materials (i.e., fencing, signage, irrigation components) upon project completion. Mitigation site preparation and installation shall reflect the habitat requirements for burrowing owls; i.e., grassland habitat with vegetation gaps or areas of lower vegetation coverage. The mitigation site shall be maintained for a period of five years to ensure successful foothill needlegrass grassland habitat establishment within the restored/enhanced sites; however, the Project Applicant may request to be released from maintenance requirements by the LACDRP prior to five years if the mitigation program has achieved all performance criteria for restoration or enhancement.
- The Monitoring Program shall include (a) qualitative monitoring (i.e., general habitat conditions, photodocumentation from established photo stations); (b) quantitative monitoring; (c) annual monitoring reports, which shall be submitted to the LACDRP for five years or until project completion; and (d) wildlife surveys and monitoring as described above. The annual monitoring reports shall include a detailed discussion of mitigation site performance (e.g., measured vegetation coverage and

diversity) and compliance with required performance criteria, a discussion of wildlife species' use of the restored and/or enhanced habitat area(s), and a list of proposed remedial measures to address non-compliance with any performance criteria. The site shall be monitored for five years or until the project applicant has been released from maintenance requirements by the LACDRP.

- Long-term preservation of the sites shall be outlined in the HMMP to ensure that the mitigation sites are not impacted by future development. A conservation easement and a performance bond shall be secured prior to implementation of the mitigation program.

Needlegrass Grassland

- **MM 5.2-8** The loss of foothill needle grass grassland within the impact area is considered to be a significant impact. Foothill needle grass grassland shall be preserved, restored, or enhanced on site and/or off site at a ratio to be determined by the County of Los Angeles Department of Regional Planning (LACDRP), but the ratio shall be no less than 2:1 for habitat restoration, enhancement, or preservation or combination thereof. A total of 342.85 acres of California annual grassland/Wildflower fields would be impacted by Project implementation. Habitat restoration is the creation of native target habitat that does not currently exist; enhancement is the improvement of existing, disturbed native habitat areas through the removal of exotic plant species, the addition of native plants and/or seeds, or other measures. Preservation is conservation of existing habitat that exhibits the functions needed to support target species such as the CBB. The mitigation ratio for habitat restoration, enhancement, or preservation shall depend on the initial quality of the habitat area to be restored, enhanced, or preserved and would be determined by the project applicant and the LACDRP. The mitigation ratio shall also be no less than 6.5 acres of habitat preserved/restored per burrowing owl location impacted (individual or pair using the same burrows) or greater than 6.5 acres of habitat enhancement per burrowing owl location impacted, depending on the ratio applied to the enhancement site(s). Foothill needlegrass grassland habitat restoration/enhancement implementation shall begin not more than one year following project impacts to this habitat type. The project applicant shall develop a HMMP and

shall submit it to the LACDRP for review and approval. The HMMP shall be developed by a qualified restoration ecologist, submitted for review and approval to the LACDRP and LACDRP and the California Department of Fish and Wildlife (CDFW) prior to issuance of grading permits, and shall be implemented by a qualified restoration ecologist and a qualified restoration contractor (as defined below). The HMMP shall also provide mitigation for the loss of burrowing owl habitat; therefore, mitigation site selection criteria shall include the suitability of the potential site(s) for the burrowing owl. Habitat restoration/enhancement shall consist of seeding of suitable foothill needlegrass grassland plant species. If it is ecologically appropriate for the selected mitigation site (e.g., soil type), Peirson's morning-glory will be incorporated into the restoration/enhancement palette. The Project Applicant shall implement the HMMP as approved by the LACDRP and CDFW and according to its specified materials, methods, and performance criteria, which shall include the following items:

a. Responsibilities and Qualifications. The responsibilities and qualifications of the project applicant, ecological specialists, and restoration (landscape) contracting personnel who will implement the plan shall be specified. At a minimum, the HMMP shall specify that the ecological specialists and contractors have performed successful installation and long-term monitoring and maintenance of southern California native habitat mitigation/restoration programs, implemented under LACDRP mitigation measures or State and/or federal natural resource agency permit conditions. A successful program shall be defined as one that has been signed off on by the LACDRP and/or a State or federal natural resource agency.
b. Performance Criteria. Mitigation performance criteria to be specified in the HMMP shall include native vegetation percent coverage and diversity (minimum), non-native vegetation percent coverage (maximum), and the cessation of irrigation a minimum of two years prior to eligibility for sign-off. The performance criteria shall reflect the habitat requirements for the burrowing owl; i.e., grassland habitat with vegetation gaps or areas of lower vegetation coverage. The HMMP shall state that the establishment of burrowing owls, and/or special status plant species (e.g., Peirson's morning-

glory), though not a requirement for site success, would be regarded by the LACDRP as a significant factor in considering eligibility for program sign-off.

c. Site Selection. The mitigation sites shall be determined in coordination with the project applicant and the LACDRP. The site(s) shall be (1) located in dedicated open space areas or areas available for dedication, and shall be contiguous with other natural open space areas; (2) configured to provide maximum habitat values for burrowing owls and other wildlife species; e.g., opportunities for escape and refuge from stochastic events such as fire, flood, etc.; (3) consist of level or gently sloping terrain, soil types, and microhabitat conditions suitable for occupation by the burrowing owl as determined by a qualified Biologist; and (4) include, to the extent feasible, soil types and microhabitat conditions suitable for the special status plant species listed above.

d. Seed Materials Procurement. At least two years prior to mitigation plant and seed installation, the Project Applicant or its consultants/contractors shall initiate collection of the native seed materials specified in the HMMP. All seed mixes shall be of local origin; i.e., collected within 30 miles, and within the same Watershed (Santa Clara River Watershed), as the selected restoration/enhancement site(s), to ensure genetic integrity. No seed materials of unknown or non-local geographic origin shall be used. Seed collection shall be prioritized according to habitat area. in the following order: (a) project impact areas (highest priority); (b) other on-site habitat areas; and (c) off-site habitat areas (lowest priority), assuming availability of seed species in multiple locations.

e. Wildlife Surveys and Protection. The HMMP shall specify any wildlife surveys (i.e., nesting bird surveys, focused/protocol surveys for special status species [e.g., burrowing owl]) and biological monitoring that are required to avoid adverse impacts to wildlife species during the performance of mitigation site preparation, installation, or maintenance tasks. Specifically, the HMMP shall specify the performance of wintering and breeding season surveys for burrowing owls, to determine the species' occupation of the mitigation site(s).

The HMMP shall also describe potential restrictions on these tasks due to sensitive wildlife conditions on the mitigation site (e.g., suspension of these tasks during the nesting bird season, as defined in project permits).

f. Site Preparation and Plant Materials Installation. For restoration or enhancement, mitigation site preparation shall include (a) protection of existing native species and habitats (including compliance with seasonal restrictions, if any); (b) installation of protective fencing and/or signage (as needed); (c) initial trash and weed removal (outside the nesting bird season) and methods; (d) soil treatments, as needed (i.e., imprinting, decompacting); (e) installation of erosion-control measures (i.e., fully natural/bio-degradable [not 'photodegradable'] fiber roll); (f) temporary irrigation installation; (g) a minimum one-year preliminary weed abatement program (prior to the installation of native plant and seed materials)--including specification of approved herbicides; and (h) seed mix application. Mitigation site preparation and installation shall reflect the habitat requirements for burrowing owls; i.e., grassland habitat with vegetation gaps or areas of lower vegetation coverage.

g. Schedule. An implementation schedule shall be developed that includes seeding to occur in late fall and early winter (i.e., between November 1 and December 31) and the frequency of long-term maintenance and monitoring activities (including the dates of annual quantitative surveys, as described below).

h. Maintenance Program. The Maintenance Program for restoration or enhancement shall include (a) protection of existing native species and habitats (including compliance with seasonal restrictions, if any); (b) maintenance of protective fencing and/or signage; (c) trash and weed removal- including specification of approved herbicides; (d) maintenance of erosion-control measures; (e) inspection/repairs of irrigation components; (f) application of remedial seed mixes (as needed); (g) herbivory control; and (h) removal of all non-vegetative materials (i.e., fencing, signage, irrigation components) upon project completion. Mitigation site preparation and installation shalt reflect the habitat requirements for burrowing owls; i.e.,

grassland habitat with vegetation gaps or areas of lower vegetation coverage. The mitigation site shall be maintained for a period of five years to ensure successful foothill needlegrass grassland habitat establishment within the restored/enhanced sites; however, the Project Applicant may request to be released from maintenance requirements by the LACDRP prior to five years if the mitigation program has achieved all performance criteria.

i. Monitoring Program. The Monitoring Program shall include (a) qualitative monitoring (i.e., general habitat conditions, photo-documentation from established photo stations); (b) quantitative monitoring; (c) annual monitoring reports, which shall be submitted to the LACDRP for five years or until project completion; and (d) wildlife surveys and monitoring as described above. The annual monitoring reports shall include a detailed discussion of mitigation site performance (e.g., measured vegetation coverage and diversity) and compliance with required performance criteria, a discussion of wildlife species' use of the restored and/or enhanced habitat area(s), and a list of proposed remedial measures to address non-compliance with any performance criteria. The site shall be monitored for five years or until the project applicant has been released from maintenance requirements by the LACDRP.

j. Long-term preservation. Long-term preservation of the sites shall be outlined in the HMMP to ensure that the mitigation sites are not impacted by future development. A conservation easement and a performance bond shall be secured prior to implementation of the mitigation program.

4. <u>Biological Resources – Cumulative Impacts</u>

Potential Effect

The Project could cause potential impacts to sensitive biological resources when added to other past, present, and reasonably foreseeable future projects having closely related impacts.

Finding

The Project is not expected to contribute a significant impact to the Project area. Incremental impacts would not be cumulatively considerable, and no additional mitigation is required.

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen potential significant environmental effects on biological resources to less than significant levels.

Facts

The Project would have potentially significant adverse impacts on biological resources. Several mitigation measures (MM 5.2-1 through MM 5.2-22, including as modified above) would be implemented to reduce these impacts to less than significant levels. Cumulative projects in the area are expected to have similar potential impacts to the Project on biological resources in the Project vicinity due to similar development activity and/or similar existing conditions. The cumulative impact on biological resources would be considered greater than the Project alone. However, when considering all the proposed and existing projects in the Project area, the Project contributes a relatively small portion of the impacts in the area due to its relatively small impact acreage, and the location adjacent to existing development. The Project is not expected to contribute a significant impact to the Project area.

Impact Conclusion

Incremental impacts would not be cumulatively considerable, and no additional mitigation is required.

5. <u>Transportation - VMT</u>

Potential Effect

Development of the Project would increase the amount of traffic in and out of the area, both on a short-term basis during Project construction and on a long-term basis during Project operation.

Finding

The Project would generate less VMT and have a VMT per service population rate lower than the NorthLake Specific Plan (NLSP) p[roject. Due to the VMT reduction, the previously approved Project's impacts would be less, and the Project would not result in any new or increased significant transportation impacts.

The Project does not conflict with the General Plan, any program plan, ordinance, or policy addressing the circulation system.

The Project would include implementation of an Access and Circulation Plan that provides circulation and design standards for the layout of arterial highways and local collector streets within the Project Site. Because the NLSP project, which included the Access and Circulation Plan, was evaluated as part of the Northlake 1992 EIR and approved as part of the NLSP, no significant impacts are anticipated.

The Project's impact on emergency access would be less than significant.

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen potential significant environmental effects on traffic (VMT) of the Project to less than significant levels.

Facts

The NLSP VMT per Service Population (27.03) is the baseline for comparison to the previously approved Project VMT per Service Population (25.70) per the methodology required by the County Department of Public Works. Per the County Department of Public Works (LACPW), this threshold is appropriate because the NLSP approval occurred before SB 743 and modifications are being made after SB 743. Because the previously approved Project VMT per Service Population is less than the NLSP, VMT impacts were determined to be less than significant. LACPW approved the VMT Transportation Analysis.

The Project does not conflict with the General Plan or any program plan, ordinance, or policy addressing the circulation system. The Project does not propose to amend or adjust roadway classifications, roadway network, transit routes, or bicycle network under existing conditions and future conditions as identified in the General Plan.

The Project would involve construction of a new internal circulation system. According to the Santa Clarita Valley Area Plan 2012 EIR, hazards due to roadway design would be evaluated on a project-by-project basis. The Project would include implementation of an Access and Circulation Plan that provides circulation and design standards for the layout of arterial highways and local collector streets in support of the NLSP. Because the NLSP, which included the Access and Circulation Plan, was

evaluated as part of the Northlake 1992 EIR and approved as part of the NLSP, no significant impacts are anticipated. Further, all roadway design would comply with applicable design standards and requirements set forth in the NLSP and would be subject to review and approval by the LACPW.

Emergency vehicles would access the Project Site using Ridge Route Road and use the internal street network. North of the Project Site, existing Ridge Route Road can be accessed from Templin Highway. Vehicular circulation within the Project Site would be accommodated by public and private roadways, which would be constructed consistent with applicable LACPW design standards for local roads. According to the California Fire Code, fire apparatus access roads need to be no less than 20 feet wide and shall always be unobstructed, which the internal Project streets will meet. Based on the Project Site plan, the internal streets and intersections, including the Project cul-de-sacs, would accommodate a fire truck.

The Project driveways are designed to comply with turning radius requirements for emergency vehicles and will not cause hazardous driving conditions. The Project's detailed design will be completed in compliance with California Fire Code requirements and not impair emergency vehicle access in the vicinity of the Project during construction and in ongoing operation. Compliance with the California Fire and Building Codes will be mandated through the plan check and approval process. This process will also ensure that adequate access for emergency services is provided, and the County's emergency response plan will be upheld during construction.

Impact Conclusion

The Project would have a less than significant VMT impact at the Project-level and would, therefore, also have a less-than-significant cumulative VMT impact.

The Project does not conflict with the General Plan, any program plan, ordinance, or policy addressing the circulation system. Impacts are less than significant.

The Project would include implementation of an Access and Circulation Plan that provides circulation and design standards for the layout of arterial highways and local collector streets in support of the NLSP. Because the NLSP, which included the Access and Circulation Plan, was evaluated as part of the Northlake 1992 EIR and approved as

part of the NLSP, no significant impacts are anticipated. Further, all roadway design would comply with applicable design standards and requirements set forth in the NLSP and would be subject to review and approval by the LACPW. Therefore, impacts would be less than significant.

The Project's impact on emergency access would be less than significant.

6. Wildfire

Potential Effect

The Project Site is located within a Very High Fire Hazard Severity Zone (VHFHSZ) and would therefore be subject to wildfire risks.

Finding

There would be less than significant impacts related to emergency response and evacuation due to a wildland fire affecting the Project area or surrounding area during construction and operations, and no mitigation is required.

There would be less than significant impacts related to exacerbation of wildfire risk that would expose the population to fire-related pollutant concentrations during construction and operations, and no mitigation is required.

There would be less than significant impacts related to installation and maintenance of infrastructure that could exacerbate wildfire risk during construction and operations, and no mitigation is required.

The increased wildfire risk from human-ignited wildfire would be less than significant. There would be less than significant impacts related to downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes during construction and operations, and no mitigation is required.

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen potential significant environmental effects on Wildfire impacts of the Project to less than significant levels.

Facts

Emergency Response Plan & Emergency Evacuation Plan

The Project area does not have an adopted emergency evacuation plan. Neither construction nor operation of the Project would impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The area's

emergency response would be enhanced by implementation of the previously approved Project with the addition of the proposed fire station and improvements to the public roadways.

The Wildfire Evacuation Memo (RPDSEIR Appendix D-1) determined that all 10 modeled wildfire scenarios allowed all vehicles to evacuate within the allowable time limit. This assumes that an evacuation point would only temporarily close (approximately 90 minutes at most) and would reopen after the fire is no longer a threat to that area. The closure of the southerly segments of Ridge Route Road would result in a temporary pause on evacuations. Since Ridge Route Road is the only egress route, a "shelter in place" recommendation may be made in an event during which Ridge Route Road cannot reopen. However, an evacuation route directly onto the I-5 freeway from Ridge Route Road would provide an alternative to Ridge Route Road but would require a substantial amount of evaluation and coordination with Caltrans to implement (NorthLake Specific Plan Wildland Fire Evacuation Scenarios – Evacuation Time Estimates Memorandum (RPDSEIR Appendix D-1)).

From a wildland fire perspective, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Project Site-specific evacuation plans would be completed as an integral part of Resident Information and Community Communications efforts by the Project sponsors, builders, and the homeowner's associations (HOAs) who would have the ongoing responsibility for this information. In addition, the Genasys Protect app is an evacuation management tool that will be available to assist future residents and first responders to effectively evacuate in the event of a wildfire occurrence. Based on the findings of both the Wildfire Report (RPDSEIR Appendix D-1) and Wildfire Evacuation Memo (RPDSEIR D-2), there would be less than significant impacts related to emergency response and evacuation due to a wildland fire affecting the previously approved Project area or surrounding area during construction and operations, and no mitigation is required.

There is currently one cumulative (i.e., related) project in the vicinity of the Project Site: the Centennial Specific Plan. This project will not utilize Ridge Route Road for access; therefore, traffic generation from this project would not affect the findings of

the evacuation analysis (Wildfire Evacuation Memo (RPDSEIR D-2)). There would be less than significant cumulative impacts related to emergency response and evacuation.

Exacerbate Wildfire Risks

Neither construction nor operation of the Project would exacerbate wildfire risks, thereby exposing occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. During construction, the Project would be required to implement all applicable Federal, State and local regulations pertaining to wildfire. Consistent with current regulations, all dwelling units during operations would be protected with automatic fire sprinklers and the site design would implement appropriate fuel breaks, fire breaks, and fuel modification zones. The Project would create buffer zones and defensible space within and adjacent to the proposed development, with particular attention to ensuring that vegetation would not touch structures or overhang roofs. Structures and homes would be fire hardened in accordance with Chapter 7A of the Building Code, Section R337 of the Residential Code and the specific requirements of Los Angeles County Fire Department (LACoFD) during the development review process for the site-specific locations. On-site, gravity fed, water supply/storage would be provided to ensure fire flow during power outages for the required duration established in the Fire Code. The Fire Management Program specified in the NLSP requires compliance with the County Fire Code and all other regulatory standards.

The size, location, and configuration of the Project make it unlikely that a fire would affect the entire site at a single time, but, rather, the fire would affect sections of the Project site's interface over a period of time allowing for resources to be redistributed and for evacuation opportunities after the fire front has passed a specific location. Travel within the site would be viable at all times, given the distance from the wildland fuels and the wildland fire protection features. The wildland fire modeling indicates there would always be some portion of the community that is not impacted or has already been impacted and is now no longer a significant risk to the occupants/evacuees. The Project Site would have three egress points available for evacuation efforts should law enforcement deem it necessary. Additionally, the combination of fuel modification, hardened structures, the placement of the structures, and features on the topography relative to the wildland fuels creates a community that is

capable of “sheltering in place” if necessary. While never a first choice by emergency service providers, if moving the population is a greater risk, this community as designed and as it would be constructed would be capable of a sheltering operation without undue risk to the residents.

All 10 fire scenarios that have been modeled have at least one evacuation point that is viable for four hours or more except one, the Freeway Spots scenario. In the Freeway Spots scenario, all three evacuation points would be viable for an estimated 30 minutes until it is limited by fire and would reopen in an estimated 60 to 90 minutes depending on location. All fire scenarios were run under extreme conditions that have been recorded in previous fires or that are likely to occur in the future and are considered the worst-case scenarios. Fires with wildland fuels, such as those adjacent to the Project Site, tend to burn in “ribbons of fire” that have a flaming front and little fire behavior behind the flaming front. For this reason, once the fire has passed, so has most of the risk associated with the fire. The Wildfire Report (RPDSEIR Appendix D-1) concluded that while fire would be expected to affect portions of the Project Site before the entire population is evacuated, options exist to change routes, use areas of refuge on a temporary basis, or shelter populations that are not currently at risk until those at risk have been moved to safer areas.

The Project traffic engineer, Stantec, modeled scenarios to validate the time needed to empty the at risk or priority populations and the entire Project Site. With each modeled scenario, the number of people at risk determines the number of dwelling units that would be a priority to evacuate (hereinafter referred to as a priority area). In some instances, the entire Project Site is in the priority area. After the priority area has been evacuated, the remainder of the site would be evacuated. Based on worst-case assumptions, the Wildfire Evacuation Memo (RPDSEIR Appendix D-1) estimated that it would require between 1 and 3.5 hours to evacuate the priority area (for the eight scenarios where the priority area is not the entire Project Site) and between 3.5 and 5.75 hours to evacuate the entire Site. For the Freeway Spots scenario, the Wildfire Evacuation Memo estimates it would require an estimated 2.5 hours to evacuate the priority area and 5 hours to evacuate the entire Project Site. For the Freeway Spots scenario, the three egress points would each be viable for approximately 30 minutes.

Therefore, in such a scenario the remaining on-site population would shelter in place until one or more evacuation points reopen (estimated to be in 60 to 90 minutes) and then evacuation would continue.

Evacuation reduces exposure to pollutant concentrations generated by a wildfire. Therefore, the combined effects of the fuel modification, roadside clearance, building code requirements, and the site design/placement of the structures work together to protect the community from a wildfire. The Project Site would provide a buffer to some of the existing communities by removing or modifying the wildland fuels that are upwind from them. With the fuel modification and roadside clearance in place, the probability of a fire originating from the Project Site is lower in the adjacent communities than without this protection. To access the wildlands, it would be necessary to traverse the 200-foot-wide fuel modification zone. Ignitions from the normal sources associated with development would be much less likely to occur. There would be less than significant impacts related to exacerbation of wildfire risk that would expose the population to fire-related pollutant concentrations during construction and operations, and no mitigation is required.

Installation And Maintenance Of Infrastructure That Could Exacerbate Wildfire Risk

Construction of the Project would not require the installation of associated infrastructure that would exacerbate fire risk. In addition, none of the proposed infrastructure would exacerbate the wildfire risk for the Project Site during operations. The improved water supply for the general area, placement of fuel modification zones, and establishment of a community that has the option to “shelter in place” if needed provides an alternative to existing residents in the immediate area where this level of protection does not exist. If evacuation to the south is not possible, nearby communities would be safer on the Project Site development areas than they would be in some of the current neighborhoods due to the protections provided as part of the Project. There would be less than significant impacts related to installation and maintenance of infrastructure that could exacerbate wildfire risk during construction and operations, and no mitigation is required.

Expose People Or Structures to Significant Wildfire Risks

As proposed, the Project would not expose people or structures on the Project Site, either directly or indirectly, during construction or operations, to a significant risk of loss, injury or death due to a wildland fire in the undisturbed areas adjacent to the site due to the use of fuel modification, defensible space, fire sprinklers, placement of the structure on the landscape/topography, street widths, amount of fire protection water available, and placement of fire hydrants at specified intervals, hardening of the structures to comply with the current wildland interface regulations, and availability of firefighter resources within the Project Site, and the regional assets available to combat a wildland fire by LACoFD and the other associated agencies (CalFire, USFS, mutual aid fire resources, call when needed fire resources) who routinely assist in the suppression of wildfires in the region.

During construction, the Project would be required to comply with all applicable federal, State and local rules and regulations governing construction fire safety, including Chapter 33 of the California State Fire Code entitled, Fire Safety During Construction and Demolition, which provides requirements for precautions against fire and requires readily accessible means of reporting emergencies, access roadways and fire department water supplies to all areas where combustible construction is occurring. This section also requires the development, implementation, and maintenance of an approved, written Site Safety Plan establishing a fire prevention program at the Project Site applicable throughout all phases of the construction, repair, alteration, or demolition work. This plan addresses the requirements of the Fire Code, the duties of staff, and staff training requirements. The Project would also be required to comply with California (Cal/OSHA) regulation section 5141.1, which protects outdoor employees exposed to wildfire smoke and poor air quality through monitoring air quality levels, required training and instructions, and control of harmful exposures to workers by providing respiratory protective equipment and portable air filters. A Project-specific Construction Monitoring Plan and Stormwater Pollution Prevention Plan (SWPPP) would be required to ensure all appropriate erosion control measures and best management practices (BMPs) are implemented during construction activities. The BMPs would include, but would not be limited to, physical barriers to prevent erosion and sedimentation, construction of

sedimentation basins, limitations on work periods during storm events, use of infiltration swales, protection of stockpiled materials, and a variety of other measures that would substantially reduce or prevent erosion from occurring during construction. In the event that a wildland fire is followed by a rain event, and results in downstream flooding or landslides from post-fire runoff, the BMP measures required to be implemented under the SWPPP would reduce the risk of runoff, post-fire slope instability, and drainage changes.

Per the approved hydrology study[8] and latest County policies, the Project has been designed with upstream debris basins that are engineered to contain debris flows from upstream natural areas that have burned in wildfires. Upstream flows are conveyed into these basins, where debris settles, and clear water would then be conveyed downstream through a conduit. Based on the approved hydrology study for the Project, Sikand concluded the proposed flows during operations exiting the Project Site would mimic the existing conditions and as such would not result in downslope or downstream flooding (Sikand, Northlake Drainage Memo 2023 (RPDSEIR Appendix D-3)).

In addition, the increase in wildfire risk due to human caused ignitions was assessed. (See Wildland Fire Risk Report NorthLake Project Addendum #1 December 2024 (RPDSEIR Appendix K).) Development of the Project Site would introduce additional wildfire risk factors as compared to existing conditions. Specifically, increased human habitation in a wildlife-urban interface increases the fire risk from arson, children playing with fire, and debris-burning; increased vehicular traffic increases fire risk from sparks, catalytic converters, and discarding of cigarettes; and the introduction of residences within the site would create a wildland-urban interface that increases the general potential for human-ignited wildfires. The Project would introduce residences within the site, creating a wildland-urban interface that increases the general potential for human-ignited wildfires. All of these factors could expose Project occupants to pollutant concentrations from wildfire or the uncontrolled spread of wildfire near or into the development footprint. Although additional opportunities for wildfires would occur, factors associated with the changes in the wildland fuels and topography would have an

[8] NorthLake Hydrology Study, 2017 (Appendix D-4 to the RPDSEIR).

offsetting effect. The ignition gradient along the Project's lateral development could lower ignition probabilities when new development areas are located nearest to the previous urban development, while existing outlying development patterns in the wildland areas may have higher probabilities for wildfire. At a point of development density, wildland fuels are reduced/eliminated or fragmented to a point where fire suppression efforts are more effective. A higher level of development would also have a greater concentration of emergency services resources to aid the protective actions needed to bring the incident to a close.

The Project would not expose people or structures on the Project Site, either directly or indirectly, to a significant risk of loss, injury or death due to a wildland fire caused by human ignitions due to the use or implementation of:

- fuel modification,
- defensible space,
- fire sprinklers,
- placement of the structure on the landscape/topography,
- street widths,
- amount of fire protection water available,
- placement of fire hydrants at specified intervals,
- hardening of the structures to comply with the current wildland interface regulations,
- availability of firefighter resources within the Project Site, and
- the regional assets available to combat a wildland fire by LACoFD and the other associated agencies (CalFire, USFS, mutual aid fire resources, call when needed fire resources) who routinely assist in the suppression of wildfires in the region.

The Project would avoid human-ignited wildfire risk by:

- Prohibiting smoking in wildland and wildland interface,
- Banning solid fuel outfire fires within the community without spark arrestor and only in approved devices, and
- Limiting access to vulnerable open space.

The Project would minimize, prevent and reduce human-ignited wildfire risk by providing:

- Fuel Breaks and Fire Breaks which reduce fire intensity and forward progress in the direction of the community,
- Undergrounding of utilities, pump stations, switch gear to make them less impacted by wildfires,
- Annual inspections for wildland interface (common areas) to insure readiness,
- Defensible space inspections to educate and inform homeowners on what can be accomplished to make the structure more resistant to wildland fires,
- Community cleanup programs (ongoing) to assist in removing wildland fuels from the interface and the community as a whole,
- Back up of critical infrastructure (water, communications, traffic control, electrical) to ensure that they are functional when needed,
- Fuel modification zones which slow or stop the forward progression of the wildland fire
- Defensible space which eliminates or greater reduces the fire pathways between the native fuels and the ignition zone around the structure,
- Roadside clearance zones which increase the utility of the roads for evacuation while reducing the impact of possible ignition sources by reducing fuels near the roads by creating a buffer area,
- New fire suppression resources which are closer/faster to the incident in order to intercede before the fire reaches a point where it exceeds the local resources and becomes a large wildland fire,
- Hardened structures to wildland fire impacts through physical construction, distance and configuration of items on or near the structure which might ignite, and
- Placement of structures relative to the potential wildland fires to reduce or eliminate the possible ignition of the structure or the vegetation around it.

Finally, the Project would compensate and offset human-ignited wildfire risk through:

- Increased detection of ignition which results in actions which limit the size and scope of the fire with early intervention by citizens or emergency personnel,
- Rapid suppression capabilities (as opposed to longer responses to areas without immediate access),
- Fire prevention and public education programs to reduce, eliminate and prevent wildland fires by changing behavior and practice which could elevate the risk of a wildland fire or its impacts,
- Community information and communication systems to keep residents informed and aware of risks, actions needed and increases the ability to plan for future actions such as evacuation prior to being in harm's way, and
- Preplanned evacuation areas/routes which are known to residents to ensure that, if evacuation is needed, it can be completed quickly and in the most efficient and effective manner.

Therefore, the increased wildfire risk from human-ignited wildfire would be less than significant.

There would be less than significant impacts related to downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes during construction and operations, and no mitigation is required.

Impact Conclusion and Project Design Features

Emergency Response Plan and Emergency Evacuation Plan

The Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Project Site-specific evacuation plans would be completed as an integral part of Resident Information and Community Communications efforts by the Project sponsors, builders, and the homeowner's associations (HOAs) who would have the ongoing responsibility for this information. In addition, the Genasys Protect app is an evacuation management tool that will be available to assist future residents and first responders to effectively evacuate in the event of a wildfire occurrence. Based on the findings of both the Wildfire Report (RPDSEIR Appendix D-1) and Wildfire Evacuation Memo (RPDSEIR D-2), there would be less than significant impacts related to emergency response and evacuation due to a wildland fire affecting

the previously approved Project area or surrounding area during construction and operations, and no mitigation is required.

There is currently one cumulative (i.e., related) project in the vicinity of the Project Site: the Centennial Specific Plan. This project will not utilize Ridge Route Road for access; therefore, traffic generation from this project would not affect the findings of the evacuation analysis (Wildfire Evacuation Memo (RPDSEIR D-2)). There would be less than significant cumulative impacts related to emergency response and evacuation.

PDF-3: Evacuation Plan: A detailed Evacuation Plan would be prepared and shall include, at a minimum, the below described evacuation plan elements, actions during a wildfire, and actions during site evacuation due to wildfire:

Evacuation Plan Elements

Coordination with applicable agencies: During development of the Evacuation Plan, the applicant will communicate with public agencies that may provide emergency response to the Project area in the event of a disaster, such as a wildfire, and emergency assistance is needed. Public agencies could include LACPW, Los Angeles County Fire Department (LACoFD), Los Angeles County Sheriff's Department (LASD), County Supervisor's Office, California Department of Transportation (Caltrans), California Highway Patrol (CHP), and companies providing utility services for the community.

Evacuation zones map: The Evacuation Plan will categorize the Project into Evacuation Zones; the Project Site is within zone CAS-RIDGE. The purpose of the Evacuation Zones is to aid agencies and/or emergency personnel in quickly identifying areas of the Project to plan for the evacuation timing, the evacuation order, and the evacuation routes so that traffic flow is managed and traffic bottlenecks are avoided. For example, the Priority Area under evacuation would be identified by the applicable Evacuation Zones.

Ingress and egress routes: The Evacuation Plan will identify regional and local ingress and egress routes such as the I-5 freeway, Lake Hughes Road Interchange, Ridge Route Road Interchange, and the Ridge Route Road and Lake Hughes Road intersection.

Street routes: The Evacuation Plan will detail the Project's internal circulation and provide evacuation routes using the Project's main three evacuation points: "B" Street at Ridge Route Road, Northlake Boulevard at Ridge Route Road, and "A" Street at Ridge Route Road.

Detour plan: In the event an evacuation point is not available, the evacuation plan will identify alternative routes to an available evacuation point.

Pre-identified safe refuge areas: The Evacuation Plan will provide a map with pre-identified safe refuge areas.

Evacuation traffic control plans: The Evaluation Plan will include traffic control plans such as, but not limited to, deployment of portable generators to intersections with traffic signals, changeable message signs to inform motorists, and modification of signal timing to allow emergency personnel to operate the traffic signals manually.

Resident outreach and education: Resident outreach will be conducted to educate residents on what evacuation zone they are in, evacuation routes, evacuation points, emergency contacts, pre-identified safe refuge areas, and notification systems to enlist.

Actions During a Wildfire

Initial action: LACoFD would assess the event and communicate with LASD if an evacuation order, evacuation warning, or a shelter in place notice is needed. LASD will coordinate with other agencies such as (but not limited to) Caltrans and CHP to close routes into the area. This could mean closing sections of the I-5 freeway or diverting local traffic in the Castaic community near Lake Hughes Road.

Community notifications: The County of Los Angeles will notify the community before, during and after an emergency. Communication will be done via an emergency alert system, Alert LA County, commercial media, amateur radio, and websites. The emergency alert system is broadcasted directly by LASD. Alert LA County is a Community Mass Notification System that is an emergency system used to contact County residents through phone calls, text messages, and email. Commercial media refers to television stations in the surrounding area. Amateur radio refers to Los Angeles County Disaster Communications Service (DCS) which works with ham radio operators throughout the County. Lastly, websites such as the

Los Angeles County Website and National Weather Service will provide up to date fire information and shelter sites. Social media could also be used to notify residents. Residents would be notified of available evacuation routes, shelter locations, refuge areas, and animal shelters.

Response organization contact list: The Evacuation Plan will include a list of contacts that will implement the evacuation plan, such as, but not limited to, LACPW, LACoFD, LASD, Caltrans, CHP, school district, and utilities.

Site Evacuation Due to Wildfire

Evacuation of the Priority Area: Emergency personnel would determine the Priority Area and provide community notifications to the affected evacuation zones on an evacuation warning, evacuation order, or a shelter in place.

Identification of available/open evacuation points closest to the Priority Area: Community notifications would include information related to the availability of the nearest evacuation points. At this time emergency personnel would monitor the movement of the fire and provide updates to the availability of the evacuation points.

Deployment of emergency personnel to direct evacuation: Based on the movement of the wildfire, emergency personnel would open or close the available evacuation points and help reroute vehicles so residents can efficiently exit the area and avoid traffic bottlenecks.

Exacerbate Wildfire Risks

There would be less than significant impacts related to exacerbation of wildfire risk that would expose the population to fire-related pollutant concentrations during construction and operations, and no mitigation is required.

PDF-3: Evacuation Plan: (see above)

PDF-4: Wildfire Prevention and Protection Features: The Project includes several features that would both help prevent a wildfire from starting from within the site and protect the on-site population and structures if a wildfire occurred on or near the site. These features include:

- The Project includes increased housing density and a consolidated design to reduce or eliminate, where possible, wildland fuels within the interior of the site and to keep the edge of the site as an identifiable interface.

- The Project has been designed to avoid and minimize low-density urban development patterns or leapfrog-type developments (i.e., those with undeveloped wildland between developed areas).
- Decreasing the extent and amount of “edge,” or interface area, where development is adjacent to undeveloped wildlands.
- The Project would establish the legal obligations within the codes, covenants, and restrictions (CCR’s) to ensure that defensible space measures are retained over time.
- Undergrounding of power lines throughout the entire Project Site except for the SCE overhead transmission lines that bisect the site.
- The Project design limits development along steep slopes and amidst rugged terrain to decrease exposure to rapid fire spread and increase accessibility for firefighting. Only a few locations have wildland fuels below (lower than proposed structures) the site and these sites would have additional protections such as radiant heat walls, increased built-in fire protection features, and/or placement of the structure so that the effects of “underslung fuels” are reduced.
- Structures and features have been sited to maximize the role of low-flammability landscape features and roadways that may buffer the development from fire spread.
- The Project would expand existing fire resources in the region, including a new fire station location and more water storage than required resulting in additional regional fire duration capacity.
- Proposed development has been situated within the existing or planned ingress/egress and designated evacuation routes to efficiently evacuate the on-site population and the existing community population, consistent with evacuation plans, while simultaneously allowing emergency access.

Installation And Maintenance Of Infrastructure That Could Exacerbate Wildfire Risk

There would be less than significant impacts related to installation and maintenance of infrastructure that could exacerbate wildfire risk during construction and operations, and no mitigation is required.

Expose People Or Structures To Significant Wildfire Risks

The increased wildfire risk from human-ignited wildfire would be less than significant. There would be less than significant impacts related to downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes during construction and operations.

SECTION 2
FINDINGS REGARDING RECIRCULATED ALTERNATIVES

In addition to the alternatives to the Project described and analyzed in the SEIR, the RPDSEIR considered and analyzed two additional alternatives in response to the Court Ruling: (1) Recirculated Alternative 1: the Creek Avoidance Alternative (CAA) and (2) Recirculated Alternative 2: the Partial Creek Avoidance Alternative (PCAA). The Draft SEIR concluded that the No Project/No Development Alternative was the environmentally superior alternative. However, as specified in State CEQA Guidelines Section 15126.6(e)(2), if the No Project Alternative is the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Of the remaining alternatives considered in the Draft SEIR, the Phase 1 Development Alternative was considered the environmentally superior alternative. However, upon consideration of the Recirculated Alternatives (CAA and PCAA), in compliance with Section 15126.6(e)(2) of the State CEQA Guidelines, Recirculated Alternative 2, the PCAA, would be the environmentally superior alternative among all six Project alternatives summarized in RPDSEIR Table 2-12 as it reduces the development footprint, thus reducing biology impacts and greenhouse gas emissions and would have less construction noise impacts (though construction noise would still be significant and unavoidable). However, the significant and unavoidable impacts to air quality would not be reduced to below a level of significance. All other impacts would be similar to the previously approved Project. On balance, Recirculated Alternative 2, the PCAA, would result in the greatest reduction in impacts compared to the previously approved Project while maintaining the same amount of housing. For these reasons, the PCAA is the environmentally superior alternative.

Project Objectives

The adopted Specific Plan's goals and policies are set forth in Table 6-1 of the Draft SEIR and serve as the Project's primary Project Objectives. In addition to these goals and polices, implementation of the Specific Plan includes the following additional Project Objectives.

- **Create a healthy "Community"**. Create an innovative, dynamic community focused on active outdoor recreation. Evoke a sense of "pride of place" where people love to live by encouraging social, civic, and leisurely interaction.
- **Celebrate uniqueness of place**. Reinforce and capitalize on the unique qualities of each neighborhood and the surrounding environment through land planning, architecture, and landscape architecture. Integrate the natural beauty and setting of the site into all land uses.
- **Create connectivity**. Encourage community participation and interaction by providing enhanced connections to recreational amenities, open spaces, and regional destinations.
- **Optimize open space relationships**. Provide a comprehensive public and private park system offering a wide variety of passive and active recreational opportunities. Enrich and support the overall walking and bicycling experience by providing significant destinations.
- **Encourage diversity**. Encourage physical, social, and economic diversity through the inclusion of a wide range of home sizes and prices, resulting in a richness of experience for all residents.
- **Integrate environmentally responsible practices**. Conservation of land, energy, materials, and natural resources is of critical importance to our continued well-being. Practices minimizing impact and use of natural resources shall be adopted, resulting in healthy, safe, and responsible environments.
- **Enhance local economic well-being**. Offer commercial and industrial land uses that will create jobs. Provide a larger population near Castaic Lake that will stabilize and support local businesses.

Recirculated Alternative 1, The Creek Avoidance Alternative

Description of Alternative

The Creek Avoidance Alternative (CAA) assumes the same design basis as the previously assessed screening alternative in the SEIR (Section 6.5, Alternatives Deemed Not Feasible, Section 6.5.1 Creek Avoidance Alternative): avoid disturbing the creek bottom that runs through the Project Site while developing a viable land plan effectuating the approved NLSP. The existing landform is created by landslides that traverse the Project Site from the westerly side of Grasshopper Creek to the easterly side of the Site boundary. Typically, per standard engineering and design practices and Los Angeles County requirements, all underlying landslides would be removed and recompacted to provide suitable soil conditions for Project development. Grasshopper Creek has several existing landslides directly underneath the creek bottom that extend from approximately 10 feet to 200 feet easterly and westerly of the creek bottom. A 300-foot setback from the creek bottom was determined to be an appropriate buffer for the CAA. Thus, the developable area for the CAA would commence at the creek setback line and ascend easterly to the easterly boundary of this Alternative. Unlike the previously approved Project, the CAA would require the realignment and new construction of Ridge Route Road, export of approximately 8.2 million cubic yards (mcy) of soils from the Project Site, and the construction of three clear span bridges to access the Project from Ridge Route Road.

The developable acreage for the CAA decreases from 364 acres under the Project to 286 acres, thereby reducing the amount of area available for development. After incorporating other conditioned site elements such as a 23-acre school site and 1-acre fire station (as per the NLSP), along with 167 acres of recreation and park areas, under the CAA, the residential unit count would be reduced to 1,815 units (of which 165 units would be affordable). Compared to the 3,150 dwelling units (of which 315 units would be affordable) under the previously approved Project, the CAA would result in a reduction of 1,335 dwelling units. The CAA would have similar commercial acreages as the previously approved Project. Proportionately, the affordable unit count would be reduced from 315 to 165 units.

Comparison of Effects

Development of the Project Site with the CAA would decrease development intensity compared to the previously approved Project. Although the degree of impacts

for many topics may be similar or less with this alternative, from an engineering geologic, geotechnical, and hydrologic perspective, the alternative is not feasible. Consistent with the previously approved Project, the CAA would result in significant and unavoidable impacts related to air quality (construction NOx, PM10, and PM2.5 and operational VOC and NOx), noise, and traffic. The CAA would result in new significant and unavoidable impacts related to geology and soils, hazards and hazardous materials, hydrology and water quality, traffic (VMT), and wildfire (greater hazards related to emergency access and evacuation due to both existing and proposed geologic and geotechnical conditions).

Finding

The CAA is rejected because it fails to meet many of the Project objectives identified in the SEIR and would not provide any of the Project benefits as set forth herein.

Facts

From an engineering geologic, geotechnical, and hydrologic perspective, the CAA is not feasible. The CAA would result in significant and unavoidable impacts related to air quality (construction and operational), noise, and traffic, similar to the previously approved Project. The CAA would result in new significant and unavoidable impacts related to geology and soils, hazards and hazardous materials, hydrology and water quality, traffic (VMT) and wildfire.

The CAA would not provide as many housing opportunities (1,815 units versus 3,150 units) and would not contribute as much towards the County's Regional Housing Needs Assessment (RHNA) allocation as the previously approved Project. In particular, the affordable unit count would be reduced from 315 units to 165 units, proportional to the reduction in dwelling units as a whole. As such, the CAA does not meet the following objective to the same degree as the previously approved Project:

- Specific Plan III, Housing, Goal i: To develop housing that satisfies the needs of the present and future residents of the NorthLake community.

The CAA would not meet the following objectives due to the adverse indirect impacts to Grasshopper Creek and resulting geotechnical and hydrogeological risks to the development compared to the previously approved Project:

- Specific Plan I, Land Use, Goal i: To encourage high quality design in all development projects compatible with and sensitive to the natural and man-made environment.
- Specific Plan IV, Open Space/Recreation, Goal ii: To preserve and protect sites with scenic and/or recreational value.
- Specific Plan IV, Open Space/Recreation, Goal iii: To reduce the risk to life and property from seismic occurrences, flooding, erosion, wildland fires and landslides.
- Specific Plan VII, Safety, Goal i: Protection of life and property.
- Specific Plan VII, Safety, Goal ii: Reduction of adverse economic, environmental and social conditions resulting from fires and geologic hazards.

Alternative 2, Partial Creek Avoidance Alternative

Description of Alternative

The Partial Creek Avoidance Alternative (PCAA) would leave Phase 1 as designed in the previously approved Project, but would reduce the scope of Phase 2 development. The reduced Phase 2 design avoids a cluster of smaller and larger landslides in the northern portion of Project Site, which results in adverse geotechnical, hydrological, and biological effects. This alternative is therefore proposed to avoid disturbing the landslides and the associated risk of additional loss of creek area. This alternative design would reduce the total disturbance area in Phase 2 by 61 percent, which would preserve a portion of Grasshopper Creek and the associated sensitive habitat within this area of the Project Site. Specifically, disturbance to the northern portion of Grasshopper Creek on the Project Site would be reduced by approximately 20 percent. This alternative provides a balanced site within the proposed Phase 2 grading footprint and does not require any additional import or export of soil, same as the previously approved Project. Furthermore, this alternative greatly reduces the raw earthwork of Phase 2 by approximately 10 mcy. This alternative would maintain the same amount of housing provided on the Project Site as the previously approved Project. The PCAA would include the agreed-upon affordable mixed-use housing (315

units) and six market-rate live-work units, and would preserve the school and fire station sites, commercial sites, and sports park proposed in the previously approved Project.

Comparison of Effects

Development of the Project Site with the PCAA would decrease the development disturbance area compared to the previously approved Project, although the uses remain the same. Although the degree of impacts for some topics may be less with this alternative, the overall impact conclusions would be consistent with the previously approved Project. Consistent with the previously approved Project, the PCAA would result in significant and unavoidable impacts related to air quality and noise. No additional significant or more significant impacts would occur with this alternative.

Finding

While the Alternative would meet the Project Objectives, it would not avoid or substantially lessen the Project's significant and unavoidable environmental impacts.

Facts

Development of the Project Site with the PCAA would decrease the development disturbance area compared to the previously approved Project, although the uses remain the same. Although the degree of impacts for some topics may be less with this alternative, the overall impact conclusions would be consistent with the previously approved Project. Consistent with the previously approved Project, the PCAA would result in significant and unavoidable impacts related to air quality and noise. No additional significant or more significant impacts would occur with this alternative.

The PCAA provides the same number of residential units as the previously approved Project, but on a smaller Phase 2 development area. As such, the PCAA contributes the same as the previously approved Project regarding the County's RHNA allocation. As with the previously approved Project, the affordable unit count would be maintained at 315 units. However, the PCAA provides less active recreational and open space area.

SECTION 3
FINDINGS REGARDING MITIGATION MONITORING PROGRAM

Section 21081.6 of the Public Resources Code requires that when a public agency is making the findings required by State CEQA Guidelines Section 15091(a)(1), codified as Section 21081(a) of the Public Resources Code, the public agency shall adopt a mitigation monitoring and reporting program (MMRP) for the changes to the Project which it has adopted or made a condition of approval, in order to mitigate or avoid significant effects on the environment.

The County hereby finds that the MMRP, which is attached as Exhibit A to these Findings and incorporated in the Project's entitlement approvals, meets the requirements of Section 21081.6 of the Public Resources Code by providing for the implementation and monitoring of Project conditions to mitigate or avoid potential environmental effects in a manner designed to ensure compliance during Project implementation. The MMRP includes all of the mitigation measures and project design features adopted by the County in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the Project. In accordance with CEQA, the MMRP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code Section 21081.6, the County hereby adopts the MMRP. In accordance with the requirements of Public Resources Section 21081.6, the County hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the Project.

SECTION 4
STATEMENT OF OVERRIDING CONSIDERATIONS

Section 21081 of the California Public Resources Code and Section 15093(b) of the State CEQA Guidelines provide that when the decisions of the public agency allow the occurrence of significant impacts identified in the EIR that are not substantially lessened or avoided, the lead agency must state in writing the reasons to support its action based on the EIR and/or other information in the record. Chapter II of the County's CEQA Guidelines incorporates all of the State CEQA Guidelines contained in Title 14, California Code of Regulations, Sections 15000 et seq. and thereby requires, pursuant to Section 15093(b) of the State CEQA Guidelines, that the decision maker adopt a Statement of Overriding Considerations at the time of approval of a project if it finds that significant adverse environmental effects identified in the EIR cannot be substantially lessened or avoided. To adopt a Statement of Overriding Considerations, the decision-maker must balance the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." These findings incorporate and state the Statement of Overriding Considerations adopted for the Project.

The Findings and this Statement of Overriding Considerations are based on substantial evidence in the record, including but not limited to the SEIR (the SEIR consists of the Draft SEIR, Final SEIR and the Errata to the SEIR), including the reference library to the SEIR, and documents and materials that constitute the record of proceedings.

The SEIR identified and discussed significant effects that will occur as a result of the Project. With the implementation of the mitigation measures discussed in the SEIR, these effects can be mitigated to levels of insignificance except for potential unavoidable significant Project impacts to air quality, noise, and traffic, as identified in Section 3 of these findings. Accordingly, the County adopts the following Statement of

Overriding Considerations. The County recognizes that significant and unavoidable impacts would result from implementation of the Project. Having (i) adopted the environmentally superior alternative, (ii) reduced the significant adverse environmental effects of the Project by incorporating Project Design Features into the Project, (iii) adopted all feasible mitigation measures described above and in the SEIR and Mitigation Monitoring Program, (iv) rejected certain alternatives to the Project (as analyzed in the SEIR), (v) recognized all significant, unavoidable impacts, and (vi) balanced the benefits of the Project against the Project's significant and unavoidable impacts, the County hereby finds that the benefits of the Project outweigh the potential unavoidable significant adverse impacts, and that the unavoidable significant adverse impacts are nonetheless acceptable, based on the following overriding considerations.

Summarized below are the benefits, goals and objectives of the Project. These provide the rationale for approval of the Project. Any one of the overriding considerations of economic, social, aesthetic and environmental benefits individually would be sufficient to outweigh the significant unavoidable impacts of the Project and justify the approval, adoption or issuance of all of the required permits, approvals and other entitlements for the project and the certification of the completed SEIR.

1. The Project will implement the approved NorthLake Specific Plan with a residential, and commercial development project with significant open space and recreation facilities that conform to the Specific Plan's goals, objectives, and policies.
2. The Project will provide a well-designed development that is compatible with and complementary to surrounding land uses.
3. The Project will generate employment opportunities for the local community and surrounding area by providing for new commercial uses that will generate approximately 548 permanent jobs and a substantial number of construction jobs over the next approximately 10 to 11 years.
4. The Project will provide a comprehensive public and private park system offering a wide variety of passive and active recreational opportunities.

5. The Project will provide 3,150 needed housing units, including 315 affordable units and senior housing, in a range of unit types, size, and prices. According to the current Regional Housing Needs Allocation (RHNA) for unincorporated Los Angeles County as stated in the Revised County of Los Angeles Housing Element (2021 – 2029), there is a need for 90,052 housing units, with some level of housing needed for each income level. While the highest amount of housing (36,533 units) is needed to serve the Above Moderate Income level, there is also a need for Low Income Units (13,691), Very Low Income Units (12,824) and Extremely Low Income Units (12,824). Although housing values will be dictated by market conditions, it is anticipated that many of the housing units proposed as part of the Project would fall within the Above Moderate Income level. Moreover, the Project will provide 315 deed-restricted affordable housing units to be reserved for Low and Very Low Income households. Therefore, the Project would assist the County in achieving its RHNA goals.
6. The Project will encourage physical, social, and economic diversity through the inclusion of a wide range of home types, sizes, and prices, including deed restricted affordable units.
7. The Project will mitigate, to the extent feasible, the potential environmental impacts of the proposed Project.
8. The Project will support public services in the area by providing sites for a fire station and a potential school.

In addition, the development and use of the Project will accomplish and be substantially consistent with Project Objectives, including the applicable goals and policies identified in the Specific Plan and described in Table 6-1 of the SEIR. The Project would produce fewer jobs due to the elimination of industrial uses as compared to the originally proposed project (NLSP project) but would provide 315 affordable housing units. The County finds that due to the pressing need for affordable housing, the revisions to the Project will result in a greater overall benefit to the County.

SECTION 5
SECTION 15091 AND 15092 FINDINGS

Based on the foregoing findings and the information contained in the record, the County has made one or more of the following findings with respect to each of the significant adverse effects of the Project:

a. Changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid many of the significant environmental effects identified in the SEIR.

b. Some changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency, or can and should be adopted by such other agency.

c. Specific economic, legal, social, technological or other considerations make infeasible the mitigation measures or alternatives identified in the SEIR.

Based on the foregoing findings and the information contained in the record, and as conditioned by the foregoing:

a. All significant effects on the environment due to the Project have been eliminated or substantially lessened where feasible.

b. Any remaining significant effects on the environment found to be unavoidable are acceptable due to the overriding considerations set forth in the foregoing Statement of Overriding Considerations.

SECTION 6
SECTION 21082.1(c)(3) FINDINGS

In approving the Project, the County decision-makers have reviewed and considered the Draft SEIR and appendices, the Final SEIR and appendices, the February, April and August Errata (collective, "Errata") as well as the RPDSEIR and RPFSEIR, and all other pertinent evidence in the record of proceedings.

The Applicant's consultants prepared the screen check versions of the RPDSEIR and RPFSEIR, responses to comments (to the RPDSEIR) and technical studies as permitted under Public Resources Code § 21082.1(a). All such materials and all other materials related to the SEIR (including the RPDSEIR and RPFSEIR) were extensively reviewed and, where appropriate, modified by the Department of Regional Planning or other County representatives. As such, pursuant to Public Resources Code § 21082.1(c)(3), the County finds that the Draft SEIR, Final SEIR, Errata, RPDSEIR, RPFSEIR, technical studies, and all other related materials reflect the independent judgment and analysis of the Lead Agency.

SECTION 7
NO RECIRCULATION

The RPFSEIR documents changes to the RPDSEIR. The RPFSEIR provides additional analysis that was not included in the RPDSEIR. The RPFSEIR merely clarifies or amplifies or makes insignificant modifications to the adequate SEIR.

The Responses to Comments contained in the RPFSEIR fully considered and responded to comments made regarding the RPDSEIR. Furthermore, the Responses to Comments include substantial evidence that none of these comments provided substantial evidence that the Project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the RPDSEIR. The County has thoroughly reviewed the oral and written public comments received regarding the Project and the RPFSEIR to determine whether any of the public comments provide substantial evidence that would require recirculation of the RPDSEIR prior to its adoption. The RPFSEIR provides adequate, good faith and reasoned response to the comments.

The County hereby finds, consistent with State CEQA Guidelines Section 15088.5, that no significant new information requiring recirculation of the RPDSEIR has occurred. Specifically, the County has determined, based on the substantial evidence presented to it, that (1) no new significant environmental impact would result from the Project or from a new mitigation measure proposed to be implemented; (2) no substantial increase in the severity of an environmental impact would result from the Project; (3) no feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the Project; and (4) the RPDSEIR is not so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. None of the information submitted after publication of the RPDSEIR, including testimony at the public hearings on the Project, constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The County further finds that none of the public comments to the RPDSEIR or subsequent public comments or other evidence in the record, including any changes in

the Project in response to input from the community or the Regional Planning Commission, include or constitute substantial evidence that would require recirculation of the RPDSEIR prior to its certification and that there is no substantial evidence elsewhere in the record of proceedings that would require substantial revision of the RPDSEIR prior to its certification, and that the RPDSEIR need not be recirculated prior to its certification.

SECTION 8
CUSTODIAN OF RECORDS

The custodian of the documents or other material which constitute the record of proceedings upon which the Board's decision is based is the Los Angeles County Department of Regional Planning located at 320 West Temple Street, Los Angeles, California 90012.

SECTION 9
ADDITIONAL CEQA FINDINGS

1. Textual refinements were compiled and presented to the decision-makers for review and consideration. The County staff has made every effort to notify the decision-makers and the interested public/agencies of each textual change in the various documents associated with project review. These textual refinements arose for a variety of reasons. First, it is inevitable that draft documents would contain errors and would require clarifications and corrections. Second, textual clarifications were necessitated in order to describe refinements suggested as part of the public participation process.

2. The County finds and declares that substantial evidence for every finding made herein is contained in the SEIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

3. The SEIR is a project EIR for purposes of environmental analysis of the Project. A project EIR examines the environmental effects of a specific project. The SEIR serves as the primary environmental compliance document for entitlement decisions regarding the Project by the County and other regulatory jurisdictions.

4. Each of the Project Design Features and mitigation measures identified in the SEIR are hereby incorporated into the, and are enforceable as, Conditions of Approval.

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January 27, 2026

BY EMAIL

The Honorable Regional Planning Commission
of the County of Los Angeles
320 Temple Street, Room 150
Los Angeles, CA 90021
Attn:

Re: Northlake Specific Plan
Responses to Public Comments

Dear Commissioners:

We represent Northlake Associates, the Applicant for the reapproval of the Northlake Specific Plan Project, a project you previously approved in 2018.

Several support letters were submitted, as well as a few letters that raise concerns about the Project or its environmental analyses. Attached hereto are point by point responses to those comment letters that raise issues with the various impact analyses contained in the Recirculated SEIR. (Attachment A, Response to Comments.) None of these letters contain credible evidence of a potential significant impact, including regarding wildfire, evacuation, biology and Vehicle Miles Travelled (VMT).

With respect to wildfire and evacuation, attached is a memorandum by Stantec, the Project's expert traffic consultant, that provides additional clarification regarding the potential evacuation impacts on existing communities, which concludes that "Northlake Project traffic is not anticipated to affect the existing communities from evacuating on Ridge Route Road." (Attachment B, Stantec January 23, 2026 Memo: Evaluation of Evacuation Impacts on Existing Communities.) Also attached is Wildland Fire Risk Addendum No. 2 which provides additional clarification on evacuation zones and implementation. (Attachment C.)

We respectfully request your approval of the improved Project with the adoption of the Partial Creek Avoidance Alternative, the environmentally superior alternative.

Very truly yours,

Damon P. Mamalakis

Attachments: Response to Comments (Attachment A)

Stantec January 23, 2026 Memorandum (Attachment B)

Wildland Fire Risk Addendum No. 2 (Attachment C)

Stantec

Memo

To:	Damon Mamalakis Armbruster Goldsmith & Delvac	From:	Daryl Zerfass PE, PTP Maria Morris AICP, PTP
Project/File:	2042648800	Date:	January 26, 2026

Reference: Evaluation of Evacuation Impacts on Existing Communities

The Northlake Project Wildland Fire Risk Report[1] (Risk Report) modeled fire behavior for ten (10) scenarios where a fire originates at different points around the Project site. The Risk Report identified a "fire flow path" that would be the priority area to evacuate for each scenario. Stantec estimated how long it would take for the residences in the priority area to evacuate using Ridge Route Road within the Specific Plan area and south to Lake Hughes Road where Ridge Route Road enters the existing Castaic community[2]. Stantec estimated the approximate number of households, vehicles, and the time needed to evacuate the Project site for each of the scenarios in the Risk Report.

Per the Risk Report, "the size, location, and configuration of the Project site make it unlikely that a fire will impact the entire Project site at as single time but rather the fire will impact sections of the project interface over a period of time which will allow for resources to be redistributed and for evacuation opportunities after the fire front has passed a specific location." Therefore, per the Risk Report, a scenario where the entire Northlake Project and the adjacent existing neighborhoods to the south[3] (Northlake Hills and Wildwood) are both in the priority area to evacuate is unlikely. It is anticipated that if the fire is coming from the north to the south, the Northlake Project will act as a buffer to the existing neighborhood to the south and would evacuate first. If the fire is coming from the south, the existing neighborhoods would evacuate first. Therefore, Northlake Project traffic is not anticipated to affect the existing communities from evacuating on Ridge Route Road.

Evacuation of the Northlake Project and adjacent communities is dependent on having adequate traffic conditions within the existing Castaic community just south of the Project area. The Ridge Route Road/Lake Hughes Road intersection is currently configured as an all-way stop but will be upgraded to a traffic signal with development of the Project. During an evacuation, traffic flow through the intersection should be directly managed by emergency personnel to ensure a continual flow of traffic from the areas being evacuated.

[1] Wildland Fire Risk Report Northlake Project, Firesafe Planning Solutions, December I 2024.
[2] Northlake Specific Plan Wildland Fire Evacuation Scenarios – Evacuation Time Estimates, August 9, 2024.
[3] There are only existing adjacent neighborhoods to the south of the Project site.

Reference: **Evaluation of Evacuation Impacts on Existing Communities**

Sincerely,

Stantec Consulting Services Inc.

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Principal, Transportation Planning & Traffic Engineering
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RESPONSE TO COMMENTS SUBMITTED FOR JANUARY 28, 2026 REGIONAL PLANNING COMMISSION HEARING

SCH No. 2015031080

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January 2026

RESPONSE TO COMMENTS

The following is a list of public agencies, organizations, and persons that submitted comments for the January 28, 2026 Regional; Planning Commission hearing. Comments have been numbered and responses have been developed with corresponding letters/numbers.

1.1 LIST OF WRITTEN COMMENTERS

A list of the public agencies and the persons and organizations that submitted written comments is provided in Table 2-1.

TABLE 2-1
COMMENTS RECEIVED ON THE RPDSEIR FROM AGENCIES, ORGANIZATIONS, AND INDIVIDUALS

Comment Letter	Date	Name
C.1	December 30, 2026	Ashley Funicello
C.2	December 30, 2026	William Kennedy
C.3	January 23, 2026	Dan Silver, Endangered Habitats League
C.4	January 26, 2026	Chad Christensen, Mountains Recreation & Conservation Authority
C.5	January 26, 2026	Peter Broderick, Center for Biological Diversity
C.6	January 27, 2026	Sydney Croasmun, Ridge Route Preservation Organization
C.7	January 26, 2026	Miguel Luna, Santa Monica Mountains Conservancy
C.8	January 27, 2026	Victoria Yundt, Lozeau Drury LLP
C.9	January 27, 2026	Tony Burke
C.10	January 27, 2026	Heather Smokler

Response to Comment Letter C.1

Ashley Funicello
December 30, 2025
Email

Comment No. C.1-1:
Good afternoon. I am writing in regards to the proposed building of 3,150 homes in the northern Castaic area. As a long time Castaic resident, I am deeply concerned about the danger to public safety this addition will cause in an emergency.

Response to Comment No. C.1-1: Commenter's concern is noted for the record.

Comment No. C.1-2:
I have been a resident in Castaic long enough to have been involved in many fires, some with mandatory evacuations, as well as countless closures of the 5 freeway due to traffic incidents or weather. With each of these incidents, our very limited access to exit routes has created a significant threat to residents. We are a small town and have already outgrown our roads. In the event of an evacuation or simply freeway closures, emergency services have no way of reaching us due to unbelievable traffic and no shoulders available for them to drive on in most areas. The addition of 3,150 homes will add at least that many more cars, more than likely double as most homes have at least two vehicles.

Response to Comment No. C.1-2: Stantec, the Project's expert traffic consultant, estimated how long it would take for the residences in the Project priority areas to evacuate in the event of a wildfire using Ridge Route Road within the Specific Plan area and south to Lake Hughes Road where Ridge Route Road enters the existing Castaic community. Stantec estimated the approximate number of households, vehicles, and the time needed to evacuate the Project Site for each of the scenarios in the Wildland Fire Risk Report. It was determined that under all scenarios, evacuation could safely take place within the allowable limit. As set forth in Stantec's January 23, 2026 Memo: Evaluation of Evacuation Impacts on Existing Communities, a scenario where the entire Northlake Project and the adjacent existing neighborhoods to the south (Northlake Hills and Wildwood, the only adjacent existing communities) are both in the priority area to evacuate is unlikely. "It is anticipated that if the fire is coming from the north to the south, the Northlake Project will act as a buffer to the existing neighborhood to the south and would evacuate first. If the fire is coming from the south, the existing neighborhoods would evacuate first. Therefore, Northlake Project traffic is not anticipated to affect the existing communities from evacuating on Ridge Route Road."

Comment No. C.1-3:
The fire we had early in 2025 made it very clear we are in a position to easily become the next Paradise in terms of catastrophic outcomes when a fire or other emergency happens. I beg you to reconsider this project. It would be incredibly irresponsible and cause massive anxiety for current residents. Please instead consider making our escape roads wider or carve out alternative routes for us. This has to be priority before any more homes can be added.

Response to Comment No. C.1-3: The Recirculated Partial Draft SEIR (RPDSEIR) wildfire analysis and the Wildfire Technical reports (RPDSEIR Appendices D-1, D-2 and K) fully comply with the requirements of CEQA and the California Attorney General's "Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act" guidelines. The Wildland Fire Risk Report was prepared in December 2024, a month before the Hughes Fire in 2025. As such, it was not included in the fire history section of the report as it had not occurred at the time the

report was prepared. Inclusion of that wildfire does not change any of the impact conclusions in the RPDSEIR or the Wildland Fire Risk Report. In fact, the Hughes Fire was predicted by Scenario 6 - LakeSpotsat40, with the origin within the County Recreation Area (RPDSEIR Appendix D-1, page 65, 68 and Appendix B), and the Evacuation Report determined that there would be sufficient time to evacuate the previously approved Project (RPDSEIR Appendix D-1, Table 6; see also RPDSEIR Appendix D-1, page 68) with no impediment to all three evacuation points. The fact that the Hughes Fire happened, as predicted, does not change the analysis, conclusion, or determination that the wildfire impact is less than significant. The Wildfire Technical report contains numerous precautionary measures, regulatory compliance measures, and project design features that will be implemented as part of the Project to reduce fire hazards and the need for emergency responses. (RPDSEIR Appendix D-1 (Wildfire Technical Report), pages 77-78.)

Response to Comment Letter C.2

William Kennedy
December 30, 2025
Email

Comment No. C.2-1:
My wife Virginia and I are retired from L.A. County Sheriff's Department and have been residents of Castaic since 2004. We currently live north of Lake Hughes Road in the CC Ranch community. In the 21 years we have lived here, we have personally experienced unique area challenges including wildfires, road closures, traffic jams, and most recently a ruptured natural gas transmission line that was directly behind our home. The reality of where we live is there is only one way in and one way out of our community which makes emergencies particularly dangerous. As long-time residents, we have learned the area and know of vital shortcuts and alternate routes that help us when these problems arise. However, these alternate routes are not always available, and some are on private property.

Response to Comment No. C.2-1: Stantec, the Project's expert traffic consultant, estimated how long it would take for the residences in the Project priority areas to evacuate in the event of a wildfire using Ridge Route Road within the Specific Plan area and south to Lake Hughes Road where Ridge Route Road enters the existing Castaic community. Stantec estimated the approximate number of households, vehicles, and the time needed to evacuate the Project Site for each of the scenarios in the Wildland Fire Risk Report. It was determined that under all scenarios, evacuation could safely take place within the allowable limit. As set forth in Stantec's January 23, 2026 Memo: Evaluation of Evacuation Impacts on Existing Communities, a scenario where the entire Northlake Project and the adjacent existing neighborhoods to the south (Northlake Hills and Wildwood, the only adjacent existing communities) are both in the priority area to evacuate is unlikely. "It is anticipated that if the fire is coming from the north to the south, the Northlake Project will act as a buffer to the existing neighborhood to the south and would evacuate first. If the fire is coming from the south, the existing neighborhoods would evacuate first. Therefore, Northlake Project traffic is not anticipated to affect the existing communities from evacuating on Ridge Route Road."

Comment No. C.2-2:
This area is not like the San Fernando Valley or the Antelope Valley where there are multiple options for evacuation routes. The newly proposed housing development will be in an area that suffered two major wildfires last year. Our home nearly caught fire in 2019. At least four homes in this community suffered fire damage. Being close to the Castaic Lake helps but it didn't prevent those homes from burning. The new developments' close proximity to the lake will not guarantee a fire will be put out immediately. Also, the last big wildfire in 2024 burned in such a way that prevented aircraft from using most of the lake due to smoke. No Super Scoopers could refill on the lake.

Response to Comment No. C.2-2: See Response above regarding evacuation. The Recirculated Partial Draft SEIR (RPDSEIR) wildfire analysis and the Wildfire Technical reports (RPDSEIR Appendices D-1, D-2 and K) fully comply with the requirements of CEQA and the California Attorney General's "Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act" guidelines. The Wildfire Technical report contains numerous precautionary measures, regulatory compliance measures, and project design features that will be implemented as part of the Project to reduce fire hazards and the need for emergency responses. (RPDSEIR Appendix D-1 (Wildfire Technical Report), pages 77-78.)

Comment No. C.2-3:
The new development will be further away from the alternate routes and shortcuts that are closer to town. It will also be built on top of the same natural gas transmission line that recently ruptured and could result in a major disaster for that community. In addition to the dangers of fires and gas lines, traffic is already challenging in the area. In the winter, it is common for the Grapevine section of Interstate 5 to be closed down completely for days at times. This will take away the alternate route of Templin Hwy for the new community and create quite a backup in town for those residents and others. Interstate 5 has been under construction since we moved into the community, and this frequently causes delays. Adding 3,000 more vehicles will create even more congestion for daily commutes and emergencies.

Response to Comment No. C.2-3: As noted in the above responses, it was determined that under all wildfire scenarios, evacuation could safely take place in the allowable limit and that Northlake Project traffic is not anticipated to affect the existing communities from evacuating on Ridge Route Road.

Comment No. C.2-4:
Finally, almost everyone in our neighborhood has to use the California Fair Plan for fire insurance. How are the residents in the new development going to afford fire insurance?

Response to Comment No. C.2-4: The comment does not raise issues regarding the RPDSEIR or the impact analyses. Social and economic issues are not within the purview of CEQA under CEQA Guidelines Section 15131. Comment is noted.

Comment No. C.2-5:
In conclusion, this new development will place extreme strains on the existing community and will be a recipe for disaster in the future. Please do not allow this development to be built.

Response to WF Comment No. 5: Comment is noted.

Response to Comment Letter C.3

Dan Silver
Endangered Habitats League
January 23, 2026
Letter

Comment No. C.3-1:

Endangered Habitats League (EHL) requests denial of this project. For your reference, EHL is a Southern California regional conservation group dedicated to ecosystem protection and sustainable land use. We are long-term participants in County planning initiatives, from the General Plan to the SEA Ordinance to the Climate Action Plan.

EHL is a longstanding "pro-housing" and a "smart growth" advocate. However, NorthLake abjectly fails minimum tests for acceptable land use. Regional Planning, through its Area Plan updates, has shown that all RHNA needs can be met in safe and environmentally sound locations. Sprawl from the early1990s – *backward even for that era* – is contrary to contemporary needs and should be rejected rather than re-adopted.

Response to Comment No. C.3-1: This is an introductory comment.

Comment No. C.3-2:

SECTION 1.0 BIOLOGY

According to the Santa Monica Mountains Conservancy, NorthLake is a "tragedy." This is not an exaggeration as it is one of the most biologically destructive proposals in my long experience. It would pave over a blueline stream (Grasshopper Creek) which runs the length of site, a virtually unprecedented impact. If this is "necessary" as the RPFSEIR claims, then a site so full of landslides that it requires 33 million cubic yards of grading is not suitable for intensive development.

640 acres of coastal sage scrub – a huge amount - would be obliterated, including many rare plants, whose very rarity indicates specialized niche habitats that make the proposed mitigation via re-planting unlikely to succeed.

Sometimes a sprawl project will preserve a large fraction of its site in intact natural open space, arguing for its approval. This is *not* the case with NorthLake. Its limited open space consists of remnants around the development periphery, impacted by development edge effects.

Response to Comment No. C.3-2: Commenter provides no evidence of a significant biology impact; rather just states general opposition. All biology impacts were determined to be less than significant.

Comment No. C.3-3:

SECTION 2.0 Fire safety

New information requires subsequent environmental analysis as shown in comments from

the Center for Biological Diversity.

Also, the County's General Plan Safety Element policies make it clear that expanding the Wildland Urban Interface (WUI) into Very High wildlife hazard with thousands of vulnerable new residents is irresponsible. This injury is compounded by the untruthfulness of the Final EIR which claims that the project – even if exempt from General Plan Policies S4.1, S4.20 and L1.10 – is "consistent" with them because it is "generally surrounded existing built development." Please look at an aerial photo of the site and then revise the Responses to Comments so that this falsehood does not compromise your Commission's integrity and make a sham of the General Plan.

Response to Comment No. C.3-3: Center for Biological Diversity did not provide any new information regarding wildfire requiring additional review or analysis. Their comment letter was fully responded to in the Recirculated Partial Final Supplemental Environmental Impact Report. The Recirculated Partial Draft Supplemental Environmental Impact Report (RPDSEIR) wildfire analysis and the Wildfire Technical reports (RPDSEIR Appendices D-1, D-2 and K) comply fully with the requirements of CEQA and the California Attorney General's "Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act" guidelines. The built environment generally consists of the 5 Freeway to the west which runs the length of the Project site; residential neighborhoods to the South, the Castaic Lake Recreational Area to the East and the Templin Highway to the North.

Comment No. C.3-4:

SECTION 3.0 Wildlife movement and mountain lion impacts

New information requires subsequent environmental analysis as shown in comments from the Center for Biological Diversity.

Response to Comment No. C.3-4: As set forth in RPFSEIR Response to Comment B.4-11, collateral estoppel bars relitigation of the mountain lion/wildlife movement and connectivity issues. See Responses B.4-1, B.4-3, B.4-5, and B.4-6. The Court Ruling denied all of the commenter's claims regarding mountain lions and wildlife crossings finding that "The use of the undercrossings by large animals was thoroughly discussed in the SEIR … The County had the best available information on the topic when it approved the Project in April 2019. The County's implied determination that the Project will not interfere with mountain lion crossings of the I-5 is supported by substantial evidence. (RPDSEIR Appendix A (Court Ruling), pages 19 through 21.)"

Comment No. C.3-5:

SECTION 4.0 VMT

Distant from employment, and locked into perpetual automotive commutes and high GHG emissions, NorthLake epitomes "dumb" growth and unsustainability. Defying common sense and well-established CEQA law, the EIR uses the baseline of the old Specific Plan instead of the required "plan-to-ground" baseline of existing conditions for VMT analysis. While this may comport with Public Works direction, that does not make it proper or legal.

Response to Comment No. C.3-5: The Project is a revision to the 1992 Project, as such it is proper and legal to use the original project as the baseline for comparison. Public Works, the

County's expert agency approved the VMT report including the methodology and impact determination. (RPDSEIR Appendix C-2).

Comment No. C.3-6:

SECTION 5.0 Alternatives

The RPDSEIR purports, based on applicant-prepared studies, that full creek avoidance is infeasible for geotechnical reasons. Has the County verified this information with an independent geologist accountable to the public? Further avoidance of Grasshopper Creek, coastal sage scrub, and rare plants may be possible.

The RPDSEIR deems the Partial Creek Avoidance Alternative (PCAA) as the Environmentally Superior Alternative. Prepared as a result of the court ruling, it reduces impacts to Grasshopper Creek by 20% and improves wildlife connectivity in the northern part of the site, while retaining all housing. The RPDSEIR notes that the PCAA does not meet the Open Space/ Recreational Area Goal *to the same extent as* the proposed Project because there would be 37 acres less Recreation/Park. However, there would still be *130 acres* of Recreation/Park. This is a very substantial amount. There is no showing that 130 acres is inadequate, that land uses could not otherwise be rearranged, or that the increased natural open space of unfilled Grasshopper Creek does not provide a compensatory benefit. An alternative can be adopted even though it does not satisfy *every* goal as much as the proposed Project. The PCAA is fully feasible.

Response to Comment No. C.3-6: Public Works reviewed the geotechnical reports for the Creek Avoidance Alternative (CAA) and agreed with the determination that it is not feasible to construct. Staff recommends adoption of the PCAA as the proposed project, and the Applicant is accepting that recommendation.

Comment No. C.3-7:

Conclusions and recommendations

A project bereft of all planning merit should not go forward. That is the case here. A plan over 30 years old, and flatly inconsistent with today's modern General Plan Safety and Land Use Elements, is far past any reasonable "sell by" date. *Your Commission is under no obligation to make Overriding Findings on behalf of the applicant.* Rather, significant and unavoidable impacts are legal grounds for denial. No vested rights accrue from the 1992 Specific Plan, whose Development Agreement expired. The project *should be denied* but followed by expeditious replanned to provide an economic use to the landowner which is consistent with the constraints of landslides, remote location, wildlife habitat and rare plants, and fire hazard.

Response to EHL Comment No. C.3-7: Commenter's opposition is noted for the record. Commenter provided no credible evidence of a significant impact or error in the Recirculated SEIR.

Response to Comment Letter C.4

Chad Christensen
Mountains Recreation & Conservation Authority
January 26, 2026
Letter

Comment No. C.4-1:

The Mountains Recreation and Conservation Authority (MRCA) recommends the Los Angeles County Planning Commission (Commission) find that the Recirculated Partial Final Supplemental Environmental Impact Report (RPFS-EIR) for Northlake Phase 1 Project No. R2015-00408, Vesting Tentative Tract Map No. 073336, Vesting Tentative Parcel Map No. 073335, and Conditional Use Permit No. RPPL2023004316 (Project) is not in compliance with the California Environmental Quality Act (CEQA) and deny the Project as presented to the Commission.

Response to Comment No. C.4-1: This introductory comment is noted for the record.

Comment No. C.4-2:

The supplemental findings of fact in the RPFS-EIR are unequivocally incorrect and inconsistent with Public Resources Code Sections 21081 and State CEQA Guidelines Section 15091 as the proposed Project requires compensatory mitigation to be performed on MRCA lands without consultation of, agreement with, or approval by the MRCA. Specifically, the RPFS-EIR identified southwestern spiny rush (*Juncus acutus*) occurrences on MRCA-owned lands to satisfactorily mitigate adverse impacts to documented southwestern spiny rush within the Project (see RPFS-EIR Mitigation Measure [MM] 5.2-5c). On October 5, 2022, the MRCA Governing Board approved MRCA Resolution No. 22-138 entering into a Mitigation Agreement pursuant to California Department of Fish and Wildlife (CDFW) Streambed Alteration Agreement 1600-2015-0271-R5 (and other regulatory permits) with Lennar Homes of California, LLC, to perform habitat mitigation on MRCA property in Marple Canyon associated with the Habitat Mitigation and Monitoring Plan for the Aidlin Hills Residential Project. MRCA has initiated this habitat restoration work in Marple Canyon and cannot provide the requisite off-site southwestern spiny rush compensatory mitigation as outlined in RPFS-EIR MM 5.2-5c.

Response to Comment No. C.4-2: When last the Applicant communicated with MRCA in 2022, Marple Canyon was available as mitigation land. MRCA had not informed the Applicant that Marple Canyon was no long available. Table 1 Summary of Northlake Mitigation Requirements and Partial List of Mitigation Opportunities to the Feasibility Analysis of NorthLake Biological Requirements (attached to Appendix B-2 of the RPDSEIR [Special-Status Plants Impact Assessment and Habitat Mitigation and Monitoring Plan]) identifies 12 additional sites with appropriate habitat for southwestern spiny rush mitigation. Thus, suitable sites are available absent Marple Canyon. Mitigation Measure MM 5.2-5c will be updated to reflect an appropriate site(s).

Comment No. C.4-3:

Further, the proposed Partial Creek Avoidance Alternative (PCAA) would irreparably impact wildlife usage of an oversized box culvert below southbound Interstate 5 (I-5) on MRCA-owned land that provides protected wildlife crossing of I-5 between Marple and Grasshopper Canyons. Deterrence of wildlife use of this protected I-5 crossing in the regionally significant, multi-agency

designed *Sierra Madre-Castaic Connection* linking the Southern California Ecoregion with the Tehachapi and Sierra Nevada ranges would result in additional wildlife-vehicle collisions on I-5 and Ridge Route Road and further reduce the genetic viability of Central Coast and Southern California mountain lion (*Puma concolor*)—a candidate species for protection by California Endangered Species Act (CESA). Given the public trust doctrine codified by Fish and Game Code Section 1600 that wildlife (and their habitat) are held in trust for the people and the protection and conservation of fish and wildlife is of utmost public interest, the Commission has an opportunity to appropriately deny the Project while satisfying the requisite conditions of the Housing Accountability Act (HAA) whereby the Project has (1) specific, adverse impacts upon public health or safety and (2) no feasible method to satisfactorily mitigate or avoid these impacts as related to southwestern spiny rush and mountain lion.

Response to Comment No. C.4-3: MRCA appears to misunderstand the development boundary associated with the PCAA. Avoiding impacts to spiny rush (which are mitigated to less than significant) and mountain lion (which are less than significant) is not a basis to deny the project with the use of the Housing Accountability Act, which requires the County to find, based on a preponderance of evidence that the project would result in a specific, adverse impact on public health or safety. Govt. Code section 65589.5(j)(1)(A) defines a "specific, adverse impact' as "a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete." The County does not have any objective, identified written public health or safety standards, policies, or conditions to support a finding that the purported impacts on spiny rush or mountain lions constitute a specific, adverse impact on public health or safety. Therefore, denial of the Project on these grounds would violate the Housing Accountability Act.

Comment No. C.4-4:

Recent wildfires in the immediate vicinity of the Project include: Holser Fire (2020), Castaic Fire (2020), Route Fire (2021), Route Fire (2022), Hughes Fire (2025), and Canyon Fire (2025). See attached MRCA – Northlake 20-Year Fire Recurrence Map for reference. Repeat fires in the same area over a short interval often result in habitat type change where former oak woodlands are converted to chaparral shrublands and chaparral shrublands are converted to grasslands—each successive type change results in more fire prone, faster burning fuel types. Because the proposed Project's development is sited over one mile from the nearest planned residential developments along Pine Crest Place, the Project unnecessarily fragments habitat and creates a fire-vulnerable island of development surrounded by flashy fuels.

Response to Comment No. C.4-4: Issues regarding potential habitat fragmentation and wildlife crossing was addressed in the underlying litigation. The Court denied the wildlife crossing challenge and did not require the wildlife crossing impact analysis to be recirculated. Specifically, the Court Ruling denied all of the commenter's claims regarding mountain lions and wildlife crossings, finding that "The use of the undercrossings by large animals was thoroughly discussed in the SEIR … The County had the best available information on the topic when it approved the Project in April 2019. The County's implied determination that the Project will not interfere with mountain lion crossings of the I-5 is supported by substantial evidence." (RPDSEIR Appendix A (Court Ruling), pages 19 through 21.)" As such, the doctrines of res judicata and collateral estoppel preclude litigation and/or relitigation of those issues. See *Ione Valley Land, Air, and Water Defense Alliance, LLC v. County of Amador* (2019) 33 Cal.App.5th 165, 171 ("Res judicata bars all of LAWDA's objections to the partially recirculated EIR certification and project approval, except for those issues arising from the partially recirculated EIR concerning traffic impacts,

because the remaining issues were litigated and resolved, or could have been litigated and resolved, in connection with the first petition, and the writ of mandate did not require the County to revisit issues other than traffic impacts."); *Sierra Club v. County of Fresno* (2020) 57 Cal.App.5th 979, 990 ("[A]n order of partial decertification is not necessary to protect Developer from relitigating the CEQA compliance of parts of the EIR not affected by the errors relating to air quality impacts. Instead, Developer is protected by res judicata, collateral estoppel and the requirement for the exhaustion of administrative remedies."); *Citizens for Open Government v. City of Lodi* (2015) 205 Cal.App.4th 296, 325-327 (res judicata barred claim that EIR failed to disclose cumulative water supply impacts as that claim was based on the same conditions and facts in existence when the original action was filed.); *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1989) 209 Cal.App.3d 1502, 1517–1518 (rejected a challenge to an EIR's impacts analysis after the issuance of a peremptory writ of mandate as beyond the scope of the additional environmental review ordered in the writ); *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 481 ("Because those challenges asserted in the new petition could have been asserted before the entry of judgment in the prior proceeding and the material facts have not changed, BEEP's challenges to the project description and to the finding on land use consistency asserted in its latest petition for writ of mandate are barred by res judicata."); *Town of Atherton v. California High-Speed Rail Authority* (2014) 228 Cal.App.4th 314, 354 ("Collateral estoppel precludes relitigation of issues argued and decided in prior proceedings."). The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No. C.4-5:

The Project's "planned" expansion of the wildland-urban interface in a California Department of Forestry and Fire Protection (CalFire) designated Very High Fire Hazard Severity Zone (VHFHSZ) endangers the public health and safety of future residents and overburdens local and mutual-aid fire departments tasked to defend ever expanding suburban sprawl. Additionally, the Project Area regularly receives high wind warnings issued by the National Weather Service to alert the public about dangerous weather conditions. As evidenced by the Palisades and Eaton Fires (2025), high wind events and wildfires can overwhelm home-hardening defenses and on-the-ground fire suppression, prevent aerial fire containment, and result in extensive destruction to life and property.

Response to Comment No. C.4-5: The Recirculated Partial Draft SEIR (RPDSEIR) wildfire analysis and the Wildfire Technical reports (RPDSEIR Appendices D-1, D-2, and K) fully comply with the requirements of CEQA and the California Attorney General's "Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act" guidelines. The Wildland Fire Risk Report took into account years of meteorological data, including wind data. It determined that under all ten modeled fire scenarios, evacuation would take place within the allowable limit. Commenter provides not credible evidence of a significant wildfire impact.

Comment No. C.4-6:

Given the extensive liabilities the County is experiencing from the Palisades and Eaton Fires (2025), the Commission should not further imperil the public, first responders, or the County's fiscal solvency by approving 2,295 new residential units in a VHFHSZ with at least one decaying 34-inch, 600-psi petroleum pipeline running through failure-prone hillsides. The Commission should also recognize the unmitigated threat the Project poses to habitat (including southwestern spiny

rush) and habitat connectivity that supports the persistence of State-protected mountain lions in Southern California.

Response to Comment No. C.4-6: See responses to above comments.

Comment No. C.4-7:

The County must also ensure the Project applicants, developers, financiers, future residents, and insurance providers sufficiently understand the multitude risks of living next to a 34-inch, 600-pounds-per-square-inch pressured petroleum pipeline that ruptured on December 27, 2025, and forced thousands of area residents and visitors to shelter in place. Preliminary investigation indicates the gas pipeline exploded after a minor landslide below Ridge Route Road, on or near LA County APN 3244-014-050 owned by Northlake Associates LLC, and approximately 250 feet from the primary ingress/egress for the Project. See attached MRCA – Northlake Gas Line Rupture Map for reference. Since there are other aging pipelines that run through the PCAA footprint, the Project's evaluation of hazards must include assessments of each petroleum pipeline, the adequacy of performed pipeline maintenance, and the planned future pipeline maintenance and/or replacement schedule(s) in the Project Area. The Project applicant must also prepare public outreach materials for all future residents (fee owners and renters) outlining emergency preparedness information about how to minimize sensitive-receptor exposure to any future gas line ruptures. Similar sensitive-receptor information should be prepared for future residents for information regarding the nearby Chiquita Canyon Landfill that is unable to abate toxic air pollution derived from uncontrolled decomposition of landfill waste. Commercial businesses within the Project must be required to publicly and prominently display emergency evacuation routes and effective methods to shelter in place.

Response to Comment No. C.4-7: Regarding the oil pipelines on the Project Site, as set forth in the RPDSEIR Project Description, "an existing crude oil pipeline easement containing two oil pipelines that traverse the entire north-south length of the Project Site would be relocated to an alignment along the eastern boundary of the proposed development area and within the identified grading footprint.) (RPDSEIR, page 1-2.) These are the only oil pipelines that run through the site. Regarding the recent gas line rupture, Northlake Associates has been working cooperatively with Southern California Gas Company to provide access to Northlake-owned property allowing SoCalGas the ability to undertake immediate geotechnical investigations necessary to design and implement a permanent repair solution. The Northlake development plans include the replacement or realignment of the existing gas line in conjunction with the Ridge Route Road improvements, further enhancing safety and reliability as the relocation will be further away from the landslide area that caused the rupture.

Comment No. C.4-8:

In 2025, MRCA completed a Wildlife Conservation Board (WCB) funded implementation project to improve 2.5 acres of cover and forage for wildlife at the above-mentioned box culvert I-5 crossing on MRCA land. Throughout the course of this state-funded project that initiated in April 2020, MRCA's wildlife cameras documented several species using the I-5 culvert including: lion, deer, bobcat, coyote, roadrunner, quail, and weasel. Attached are select photos (see MRCA Marple Canyon Photo Exhibit) that document wildlife that will be directly impacted by Project construction and prevented from using this critical connectivity point across the 26-mile-plus I-5 wildlife barrier from State Route 138 (SR 138) to State Route 126 (SR 126) as identified on the

Project's PCAA Exhibit 2 map. The same PCAA Exhibit 2 map also delineates presumed wildlife dispersal routes through the Project where wildlife will have to cross a new, at-grade, 64-foot-wide "Modified Industrial Collector" and several crossings of new, at-grade, 40-foot-wide "Local Collector" streets to travel between Grasshopper Canyon and Marple Canyon.

Response to Comment No. C.4-8: See above responses regarding wildlife crossings.

Comment No. C.4-9:

Grasshopper Canyon is currently undeveloped except for overhead and underground utilities and unpaved roads to service these utilities—virtually no barriers to wildlife movement. By developing Grasshopper Canyon, even with the reduced grading footprint for the PCAA, wildlife will be irreparably harmed by the Project's impacts to existing wildlife dispersal routes and forced to cross new Project roads that do not incorporate any avoidance or mitigation measures (such as oversized culverts or bridge spans, habitat cover to reduce vehicle noise and light impacts, etc.) that can facilitate east-west wildlife movement through the Project. The proposed "emergency vehicle access" road to the new school site will connect to Ridge Route Road within 450 feet of the I-5 crossing structure on MRCA property. At minimum, this school service road must be realigned to the south, as shown on MRCA – Northlake Road Alignment Alternative Map, to avoid and/or mitigate additional impacts to this existing I-5 wildlife crossing route of regional significance.

Response to Comment No. C.4-9: As noted in the responses above, the PCAA will not impact or interfere with the existing I-5 crossing. The comment regarding the location of the emergency vehicle access road is noted for the record and will be forwarded to the decision makers.

Comment No. C.4-10:

The proposed PCAA school service road's connection with Ridge Route Road is dangerously close (within 200 feet and on a slight curve) to the Marple Canyon access road used by MRCA, Southern California Edison, SoCalGas Company, and contractors to enter and exit Marple Canyon. The gate at this location is a double-arm swinging gate and there is minimal room for parking along Ridge Route Road to unlock or close the gate. As designed, the school's service road will endanger authorized work crews and the public traveling Ridge Route Road. At minimum, the school service road should be moved to approximate the orientation shown in MRCA – Northlake Road Alignment Alternative Map; however, MRCA recommends a formal traffic study to align with appropriate site distances and intersection design criteria set forth in the California Highway Design Manual as Ridge Route Road is often used as a bypass for I-5 during extreme traffic conditions.

Response to Comment No. C.4-10: See above response. The emergency access road will meet all required design standards such that there will not be a potential safety impact. Commenter provided no credible evidence of a potential safety impact.

Comment No. C.4-11:

In furtherance of the multi-agency designed *Sierra Madre-Castaic Connection* to identify the least-cost corridor for movement of priority indicator species between the Tehachapi Range and the Transverse Ranges of Southern California, MRCA is conducting a project in coordination with California Department of Transportation (Caltrans), CDFW, U.S. Geological Survey (USGS), and other partner organizations, to study the 26-mile stretch of Interstate 5 (I-5) between SR 138 and SR 126 for wildlife permeability and opportunities to improve wildlife connectivity across I-5. CDFW

and Caltrans have each designated this section of I-5 as a barrier to wildlife movement and genetic contact between increasingly homogenous Southern California species with their more heterogenous populations of the Tehachapi and Sierra Nevada mountain ranges.

Preliminary MRCA I-5 study data indicates the oversized box culvert on MRCA property below the southbound I-5 regularly transmits priority megafauna between Marple and Grasshopper Canyons. Complementary mountain lion field work is being collected by U.C. Davis's California Carnivores Program in coordination with U.S. Forest Service to determine how regional lions are, or are not, able to cross I-5. The U.C. Davis project has only recently collared a mountain lion west of I-5 near the Project Area; however, the extent of tracked mountain lion movement data, compared to mountain lion roadkill data, indicates that lions confined east of I-5 and south of SR 138 have limited points of access westerly across I-5 and any further reductions in wildlife connectivity across I-5 associated with the proposed Project will represent cumulative, avoidable impacts to a CESA-protected species. See MRCA – Northlake Puma Observation Map for reference.

Adding additional vehicle traffic to Ridge Route Road to serve the Project's 2,295 new residential units will reduce wildlife approaches to the CDFW and Caltrans recognized I-5 barrier and force wildlife to attempt dangerous at-grade crossings or attempt to use the northern Marple Canyon box culvert identified on PCAA Exhibit 2 that leads directly to an existing paintball/airsoft park that severely dissuades wildlife connectivity. Extensive roadkill data compiled for MRCA's I-5 wildlife connectivity study indicates Project development of Grasshopper Canyon will result in addition roadkill of priority megafauna species including mountain lion, mule deer, black bear, bobcat, coyote, and fox. Increased wildlife-vehicle collisions resultant from the Project will similarly endanger vehicle occupants, increase insurance costs, and increase commerce delays on an already congested I-5.

Through a series of acquisitions facilitated by the Trust for Public Land, in 2022 MRCA completed the 6,000-acre-plus Temescal-Hathaway Ranch acquisition that comprises the bulk of the County-designated Santa Felicia Significant Ecological Area (SEA). Project development would impact wildlife connectivity between Castaic Lake and the Santa Felicia SEA that abuts Ventura County and Lake Piru. Development of 2,295 residential units and associated roadway improvements would irreparably harm wildlife connectivity in this biologically unique and sensitive area between perennial water sources of Lake Piru and Castaic Lake. While Southern California is not currently experiencing drought conditions, climate change science anticipates future droughts punctuated by extreme rainfall events which requires conservation of existing surface water resources and preservation of access to surface water in support of rare, threatened, endangered, or at-risk wildlife.

Response to Comment No. C.4-11: See above responses regarding wildlife crossings.

Comment No. C.4-12:

Considering the threat to public health and safety posed by this Project and the inability of Project applicant to propose mitigation that satisfactorily avoids or mitigates impacts to wildlife and habitat, the Commission is fully justified to deny Project No. R2015-00408, Vesting Tentative Tract Map No. 073336, Vesting Tentative Parcel Map No. 073335, and Conditional Use Permit No. RPPL2023004316.

Response to Comment No. C.4-12: Commenter's concluding comment is noted for the record

and will be forwarded to the decision makers.

Response to Comment Letter C.5

Peter Broderick
Center For Biological Diversity
January 26, 2026
Letter

Comment No. C.5-1:

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the proposed Northlake Development ("Project"). The Center has reviewed the Recirculated Partial Final Supplemental EIR ("EIR") closely and remains concerned that the EIR's analysis of, *inter alia*, biological resources, wildfire, and transportation impacts is inadequate. The Center urges the Regional Planning Commission ("Commission") not to approve the Project without first remedying these deficiencies.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles County.

Response to Comment No. C.5-1: This introductory comment is noted and will be forwarded to the decision makers.

Comment No. C.5-2:

I. The RPFSEIR Fails to Adequately Assess and Mitigate the Project's Impacts to Mountain Lions and Wildlife Connectivity.

The RPFSEIR fails to appropriately respond to the Center's comments regarding mountain lions and wildlife connectivity, stating "[w]ith respect to the portions of the SEIR that were not recirculated, the doctrines of res judicata and collateral estoppel preclude litigation and/or relitigation of those issues states" (RPFSEIR at 2-22) and that "[c]ollateral estoppel bars relitigation of the mountain/wildlife movement *[sic*] and connectivity issues" (RPFSEIR at 2-24). However, as discussed in the Center's May 29, 2025 comment letter, new and significant information regarding the conservation status of local mountain lions and the increasing threats they face, the movement of at least one mountain lion adjacent to the Project area, and the importance of the existing wildlife connectivity in and near the Project area for their long-term survival has become available since the EIR was certified in 2018.

The California Environmental Quality Act ("CEQA") states that a subsequent or supplemental EIR may be required when either (1) substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report or (2) new information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available. (Pub. Res. Code § 21166.) Below we present clear evidence regarding mountain lions and wildlife connectivity that falls into both categories. Therefore, the RPFSEIR fails to comply with CEQA.

A. Since Project Approval, CDFW has Recommended Mountain Lions in the Project area to be Listed as Threatened under the California Endangered Species Act.

The Project area is located in the Sierra Pelona Mountains, which is within the geographic range of the Southern California and Central Coast mountain lion populations that were petitioned to be listed under the California Endangered Species Act ("CESA") in June 2019 (Yap et al., 2019). In April 2020 these populations were granted "candidacy status" under CESA, such that they are afforded the same protections as other CESA-listed species. And on December 10, 2025, the California Department of Fish and Wildlife ("CDFW") released their status review regarding the petition and recommended listing all of the petitioned mountain lion populations as a threatened Southern California and Central Coast mountain lion distinct population segment (DPS) under CESA (CDFW, 2025a).

CDFW's recommendation relies on numerous scientific studies published after the Northlake EIR was certified in April 2018 that illuminate the dire conditions of the DPS mountain lion populations' genetic health and viability, the myriad threats they face, and the importance of the Project area for their long-term survival (e.g., Benson et al., 2019, 2023; Gustafson et al., 2018, 2021); see the Center's May 29, 2025 comments, the CESA petition [Yap et al., 2019], and the CESA status review [CDFW 2025a] for more studies and details). In particular, CDFW identifies the Sierra Pelona Mountains as a high priority area that is critical to maintain and improve the genetic health of the populations within the DPS because of its proximity to the Tehachapi Mountains, an important area for genetic exchange between the DPS and relatively robust mountain lions in the Western Sierra Nevada (CDFW, 2025a). According to CDFW, "[m]itigating the barriers of Highway 58 and Interstate 5 to allow safer and easier dispersal across those roads should be considered high priorities, as well as the conservation of suitable habitat in the Sierra Pelona, Topatopa, and San Emigdio Mountains" (CDFW, 2025a).
The previously certified EIR does not—and cannot—adequately analyze or mitigate impacts of the Project on mountain lions given this wealth of new information.

The Project would result in the destruction of high-priority mountain lion habitat and degradation of a critical connectivity area that is already constrained, which could drive the Southern California and Central Coast mountain lion DPS closer towards extinction. The Project is also located adjacent to a segment of the I-5 that, in 2024, CDFW identified as Barrier ID W231: I-5 Sierra Madre to Castaic Ranges, with mountain lion as a target species for recovery (CDFW, 2024). According to CDFW, "[t]he Sierra Madre-Castaic linkage is vitally important for restoring gene flow to southern California mountain lion populations" (CDFW, 2024).CEQA requires a "mandatory finding of significance" when a project has the potential to impact a CESA-listed species. (CEQA Guidelines § 15065(a)(1); *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 792 fn. 12.) And such a finding triggers a duty to consider and adopt all feasible alternatives or mitigation measures to reduce such impacts. (Pub. Res. Code § 21002.) Moreover, CESA provides that agencies should not approve projects that could jeopardize the continued existence of this DPS or result in destruction of essential habitat (Fish & Game Code, § 2053(a)) and agencies must require that appropriate mitigation measures be implemented for projects that could destroy mountain lion habitat or impair connectivity. (See Fish & Game Code, § 2054).

The CESA status of local mountain lions as a candidate species in 2020 and a recommended threatened DPS in 2025 and the numerous scientific studies published after the 2018 EIR certification qualify as both (1) substantial changes that require major revisions in the environmental impact report so that it includes adequate analyses and mitigation for the Project's impacts to mountain lions and wildlife connectivity and (2) new information, which was not known and could not have been known at the time the environmental impact report was certified as

complete. (Pub. Res. Code § 21166.) The RPFSEIR lacks any analysis or mitigation for the Project's impacts to mountain lions and therefore fails to comply with CEQA.

B. Since Project Approval, at Least One Mountain Lion Traveled from Grasshopper Canyon to Marple Canyon Through an Adjacent Wildlife Crossing.

The Mountains Recreation and Conservation Authority ("MRCA") documented at least one mountain lion using a box culvert under the southbound I-5 that is adjacent to the Project area. Photos, authenticated by the attached declaration from Chad Christensen, the Deputy Chief of Natural Resources and Planning for MRCA, depict a mountain lion crossing from the east side of the southbound direction of the separated I-5 freeway from Grasshopper Canyon westerly into Marple Canyon on November 5, 2020 approximately between 2:49 a.m. and 2:59 a.m. (the "Mountain Lion Photos") (Exhibit A). The single-lane box culvert for the Marple Canyon access road that crosses under this southbound section of I-5 is identified as "Tunnel 2" and "Underpass 2" in Santa Monica Mountains Conservancy's April 17, 2018 letter on the Northlake Development (Exhibit B). Underpass 2 is one of two freeway crossing structures along a ten-mile section of I-5 between Templin Highway and Castaic Creek. The MRCA owns 245 acres of Marple Canyon west of Underpass 2 between the separated north-/southbound sections of I-5 and six acres east of Underpass 2 that connect with Grasshopper Canyon. The Mountain Lion Photos were taken by a camera placed on MRCA conservation lands by Mr. Christensen for the MRCA's Marple Canyon I-5 Wildlife Crossing Enhancement Project.

The use of this crossing by a mountain lion moving west, towards the severely imperiled Central Coast South population that is facing an "extinction vortex" (Benson et al., 2019) from the eastern side of I-5 indicates potential gene flow that is desperately needed. According to researchers, "a single migrant [per generation] can have immediate positive effects on the genetics of a small, isolated and inbred puma population" if the individual successfully breeds (Gustafson et al., 2017). This documented movement adjacent to the Project area highlights the critical value of the Project area as live-in and move-through habitat and for east-west mountain lion movement.

While the approved 2018 EIR for the Northlake Project does generally acknowledge that mountain lions may use the Project area (2018 Final EIR at 2-136), County counsel joined the project proponents (which include Northlake Associates, LLC, which is controlled by NLDP Associates, LLC, Castaic Development Partners, LLC, and Michael Rosenfeld of Woodridge Capital Partners, LLC) in representing in court proceedings that "mountain lions will not be impacted by the Project" and "mountain lions are not using Project site crossings as confirmed by expert studies, including a wildlife camera study …" (Respondents' and Real Parties in Interest's Joint Opposition Trial Brief at pp. 8 & 16-17.) The Mountain Lion Photos demonstrate that these claims (which were based on a developer-commissioned study) are incorrect.[1]

[1] On December 17, 2020, the Center for Biological Diversity and Endangered Habitats League requested judicial notice of the Mountain Lion Photos in Los Angeles County Superior Court case *Center for Biological Diversity et al. v. County of Los Angeles et al*., Case No. 19STCP01610, and the County and developer submitted a brief opposing the request for judicial notice. The request was denied, and the Mountain Lion Photos were not considered in the Court's decision.

The County's own staff biologist, Joseph Decruyenaere, urged the developer's EIR drafters not to minimize the connectivity value of the existing culverts under the I-5, which are far from perfect but are the only available means for mountain lions to cross the I-5 in the area. Mr. Decruyenaere wrote that the EIR language prepared by the developer's consultant:

> unduly minimizes the value of compromised movement opportunities. Nowhere else in biological conservation would you want to argue that because a resource is rare it's less than valuable. The fact that the use of a highly constrained opportunity for movement between natural areas might be made more difficult should always be considered a potentially significant impact unless there simply aren't any wildlife around to use the crossing. If a movement opportunity lacks a vegetated approach or some other feature that would seem to make it work better, that doesn't mean it doesn't pose an opportunity for movement. It just suggests that an animal might be less inclined to use it in the imaginary scenario that they have a better alternative. **However, in the real world, and in the highly fragmented, difficult to navigate landscapes that wildlife are consigned to, compromised movement opportunities may be the only opportunities available.** Revise the discussion to acknowledge the value of the crossings and instead of devaluing them, talk about how the project might change the potential for their use.[2]

Mr. Decruyenaere also wrote that the developer's consultant relies "chiefly on the idea that existing crossing features are not ideal but [they] neglect[] to provide conclusions as to how overall wildlife movement on the site and through the crossing features may actually change with buildout of the project."[3]

The Mountain Lion Photos confirm that mountain lions (and likely other wildlife) can and do use the culvert adjacent to the Project site even if the culvert could be enhanced to be more friendly for wildlife. If built as proposed, the Northlake Development would destroy high quality, intact mountain lion habitat; degrade surrounding habitat with edge effects including but not limited to new roads and increased traffic, lighting at night, noise, rat poisons, disease risk, domestic animals, and wildfire, which could have direct and indirect impacts to mountain lions (e.g., (Barrientos et al., 2023; Benson et al., 2023; Blakey et al., 2022; CDFW, 2025b); block this critical crossing; and further constrain the already-limited movement opportunities for mountain lions and other wildlife in the region.

The Mountain Lion Photos qualify as both (1) a substantial change that requires major revisions in the environmental impact report so that it includes adequate analyses and mitigation for the Project's impacts to mountain lions and wildlife connectivity and (2) new information, which was not known and could not have been known at the time the environmental impact report was certified as complete. (Pub. Res. Code § 21166.) The documented use of this crossing by a mountain lion, new scientific studies identifying the vulnerability of the region's mountain lions to extinction and the importance of the Project area for mountain lion habitat and connectivity (and

[2] Mr. Decruyenaere's comments were attached to an email sent by County Planner Jodie Sackett on February 18, 2018 and are accessible in the administrative record ("AR") of the Los Angeles County Superior Court case *Center for Biological Diversity et al. v. County of Los Angeles et al*., Case No. 19STCP01610 at AR025874 (and Mr. Sackett's email is located at AR025825-26).

[3] Mr. Decruyenaere's comments are included in an email sent on February 12, 2018, and is available at AR025822-23.

therefore the genetic health of populations within the DPS), and CDFW's recommendation to list local mountain lions as threatened under CESA illuminate the major deficiencies in the previously certified EIR and precipitate the need of new analyses of the Project's impacts to mountain lions and wildlife connectivity in the RPFSEIR. (See *Moss v. County of Humboldt* (2008) 162 Cal.App.4th 1041 [finding supplemental environmental review was required when there was mere anecdotal evidence of a listed species newly occurring in the project area].)

C. New Data Indicate the Project Area is Important for Mountain Lions and Wildlife Movement.

The Project area is located in a focal area for recent and ongoing wildlife connectivity and mountain lion studies. As mentioned previously, CDFW has identified the I-5 as an important barrier to mitigate to improve gene flow in the Southern California/Central Coast mountain lion DPS, in part because of the area's importance for statewide gene flow and there is high quality suitable mountain lion habitat on both sides of the freeway. These studies aim to help decisionmakers understand how mountain lions are moving through the area and how conditions could be improved to support more movement. From 2022 to 2025, the UC Davis California Carnivores Program collected movement data from several individuals that were radio-collared west of I-5 and north of SR-138 as part of the first phase of their ongoing study, "Understanding ecological and human-related factors affecting felid movement in a critical wildlife linkage" (Figure 1). The study area was focused in the Tehachapi Mountains linkage, north of the Project area. In October 2025 the UC Davis California Carnivores Program began the second phase of their study, expanding southward to investigate mountain lion movement in the Castaic Study Area (Figure 2). January 2026 was their first month of attempting captures, and they have already collared two individuals west of I-5 (Figure 3).

In addition to the radio-collar data, a young injured mountain lion cub was found in Castaic, on Hillcrest Parkway near Olympic Street, on January 21, 2026. And witnesses observed a mom and sibling mountain lion nearby. The presence of these mountain lions in Castaic indicates suitable habitat in the vicinity, including in the Project area. And when the young mountain lions become old enough, they will need suitable habitat and connectivity to safely disperse and find their own territories.

The data indicate that mountain lions are present and moving through the landscape quite widely while also showing the I-5 is a formidable barrier to movement. This highlights the importance of every single time a mountain lion is able to successfully cross the I-5 through the limited culverts. Although mountain lions east of I-5 and south of SR-138 have not yet been collared, the UC Davis researchers are planning to collar mountain lions in the area as part of the study. Given the data of mountain lion movement west side of I-5 and the high quality habitat east of I-5, mountain lions are likely living in and moving through the Project area.

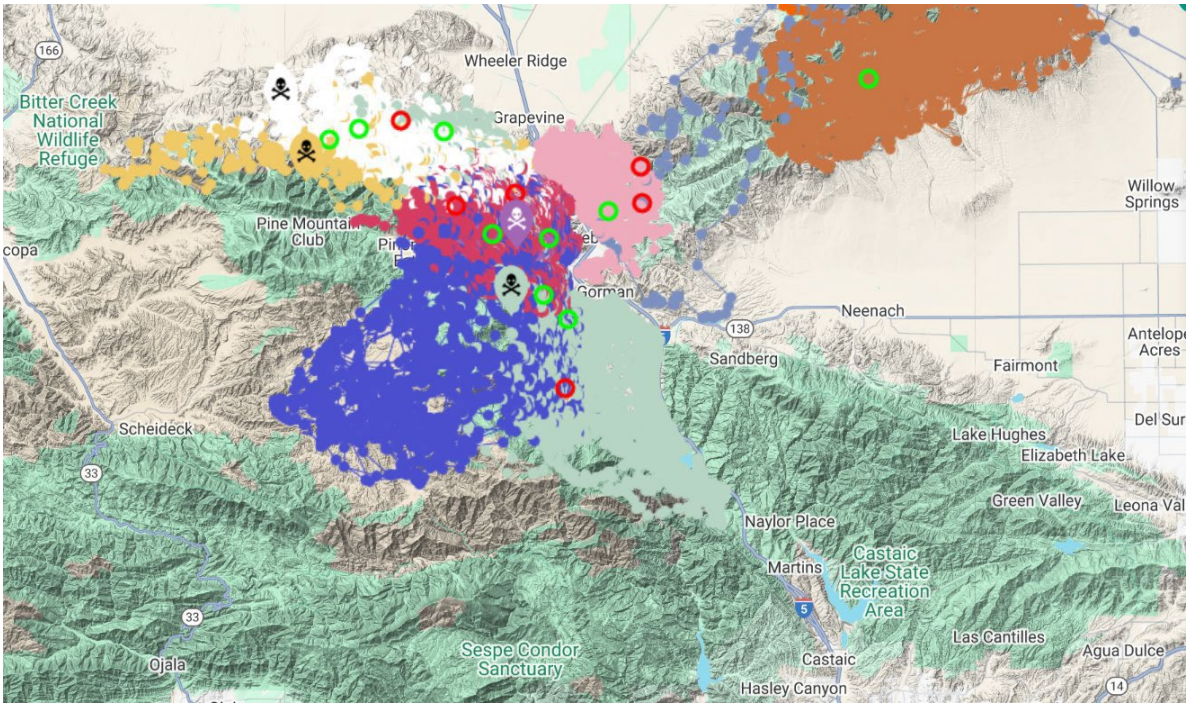

Figure 1: The last 18 months of radio-collar data from individuals captured in the first phase (2022-2025) of the UC Davis California Carnivores Program study.

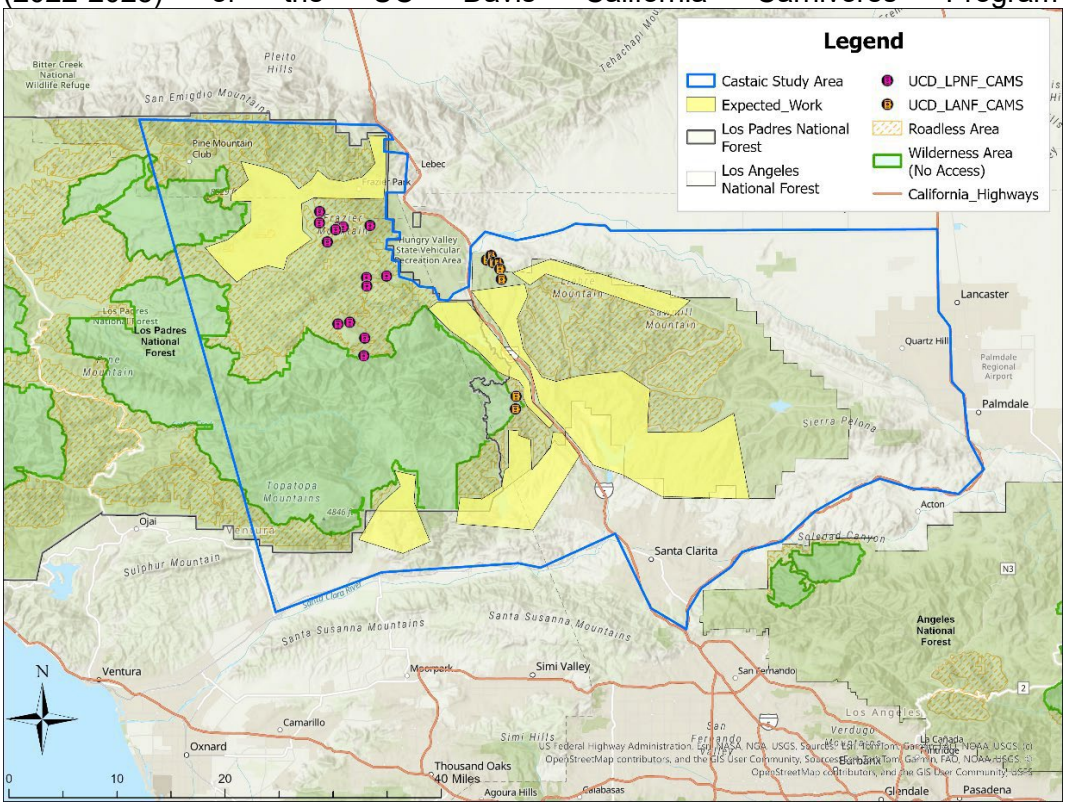

Figure 2: The UC Davis California Carnivores Program Castaic Study Area. This encompasses the second phase of the study, which began in October 2025.

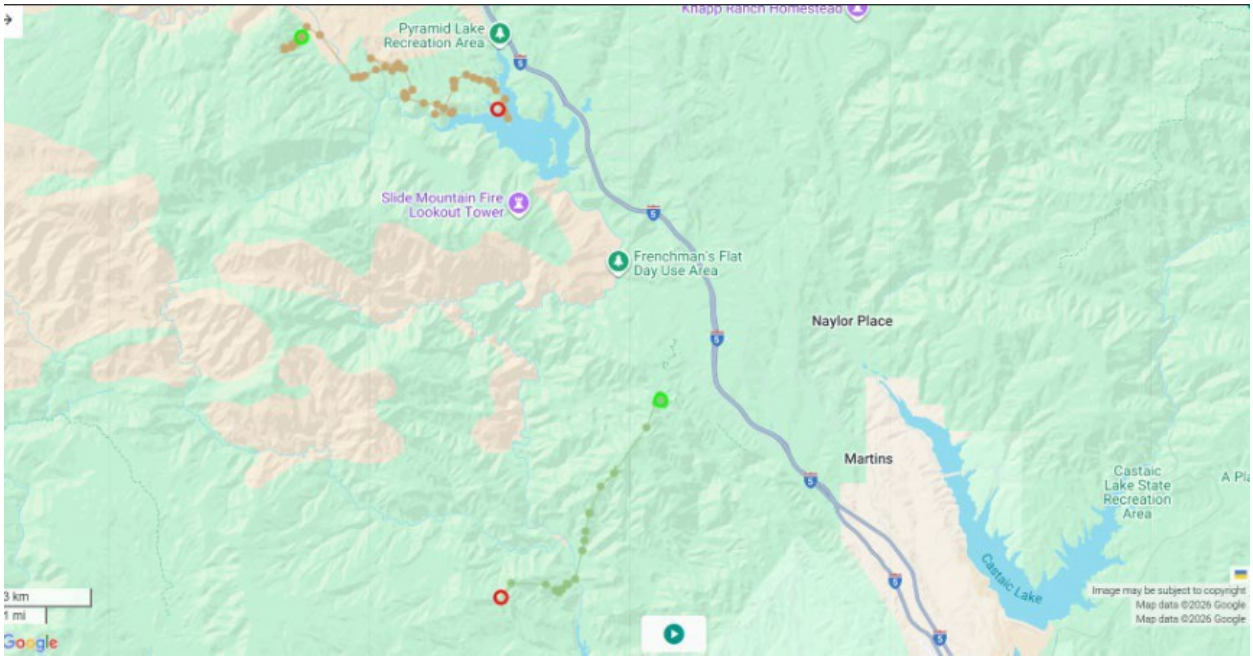

Figure 3: GPS collar data from the first two mountain lions collared in the Castaic Study Area. These lions were captured and collared in January 2026. Meanwhile, the Mountains Recreation and Conservation Authority ("MRCA") is leading a wildlife connectivity study in the area for their "Interstate 5 (Sierra Madre-Castaic) Wildlife Crossing Infrastructure Assessment and Implementation Plan," which began in December 2025. Their study includes roadkill surveys and wildlife cameras set up at culverts along I-5, including along the section of I-5 that is near the Project area. Importantly, in the first two months since they placed cameras at culverts along I-5, they have documented three instances of a mountain lion using culverts less than four miles from the northernmost portion of the Project area (Figure 4). Mountain lion home ranges can be large, depending on the sex and life stage (i.e., females tend to have smaller home ranges than males, females denning with kittens shrink their home ranges, and dispersing subadult mountain lions can travel long distances). For example, in the nearby Santa Monica Mountains, home ranges were found to be an average of 52 mi^2 for females and 144 mi^2 for males in the nearby (Riley et al., 2021). And dispersing mountain lions in Southern California have been documented traveling 50 to 93 miles (Vickers et al., 2015). Given their large home ranges and long-distance traveling behaviors, it is not inconceivable that the mountain lions documented in nearby culverts could move through the Project area and be impacted by new development there. In addition, other wildlife have been documented using the culverts (Figure 5), indicating these culverts provide important connectivity for other wildlife in the region.

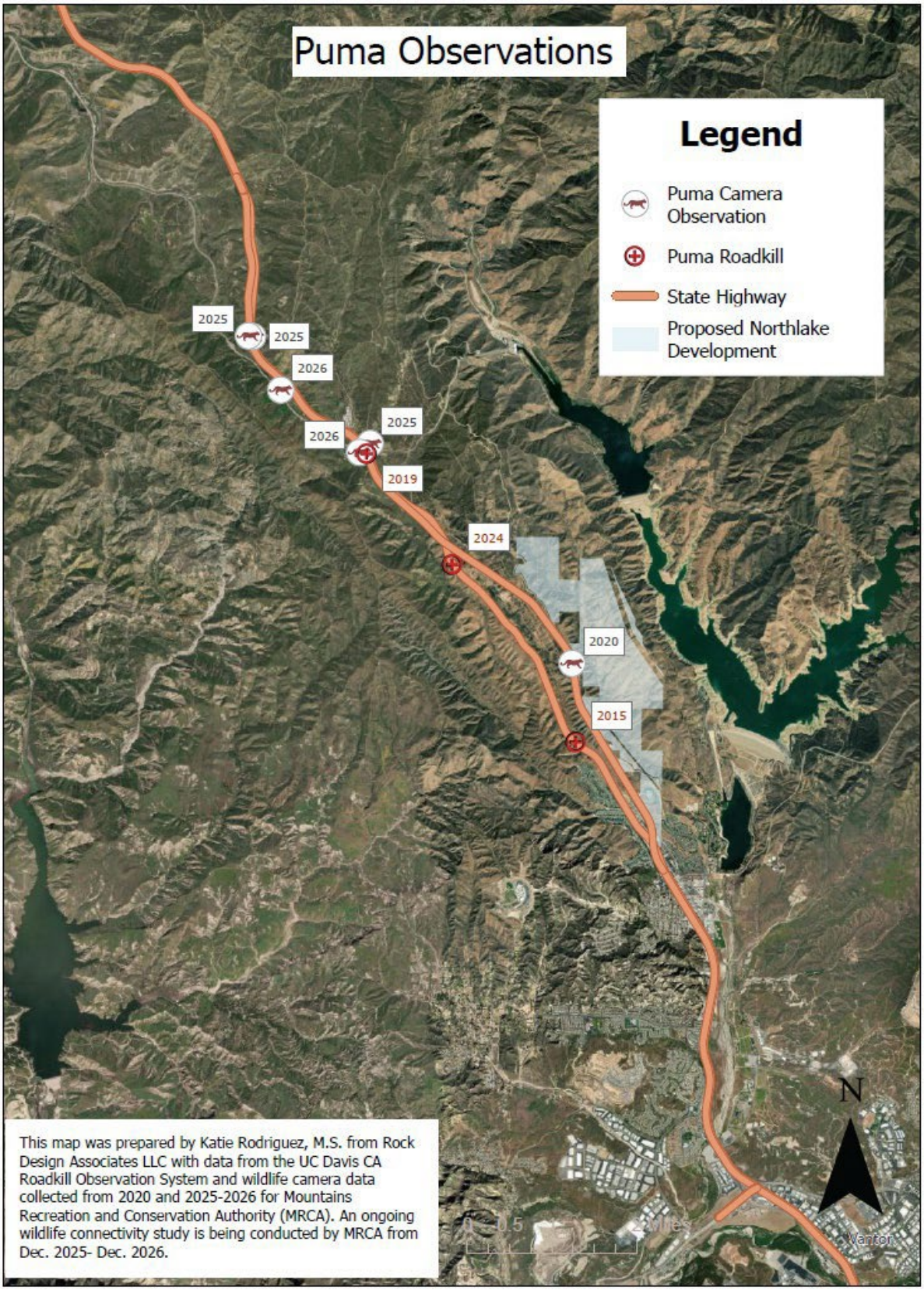
Puma Observations
Legend
Puma Camera Observation
Puma Roadkill
State Highway
Proposed Northlake Development
2025
2025
2026
2026
2025
2019
2024
2020
2015
This map was prepared by Katie Rodriguez, M.S. from Rock Design Associates LLC with data from the UC Davis CA Roadkill Observation System and wildlife camera data collected from 2020 and 2025-2026 for Mountains Recreation and Conservation Authority (MRCA). An ongoing wildlife connectivity study is being conducted by MRCA from Dec. 2025- Dec. 2026.
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Figure 4: I-5 Other wildlife observation data from MRCA's ongoing wildlife connectivity study.

Response to Comment No. C.5-2: As set forth in RPFSEIR Response to Comment B.4-11, collateral estoppel bars relitigation of the mountain lion/wildlife movement and connectivity issues. See Responses B.4-1, B.4-3, B.4-5, and B.4-6. The Court Ruling denied all of the commenter's claims regarding mountain lions and wildlife crossings, finding that "The use of

the undercrossings by large animals was thoroughly discussed in the SEIR … The County had the best available information on the topic when it approved the Project in April 2019. The County's implied determination that the Project will not interfere with mountain lion crossings of the I-5 is supported by substantial evidence. (RPDSEIR Appendix A (Court Ruling), pages 19 through 21.)" In any event, the PCAA, which the applicant is accepting as the proposed project, pulls the Phase 2 development boundary further south on the Project Site. Thus, Phase 2 development is necessarily further away from the wildlife crossing of I-5 between Marple and Grasshopper Canyons and will not deter wildlife from using this crossing. The northernmost portion of Phase 2, the area above the development line, will remain undeveloped. This is depicted on the PCAA Wildlife Crossing Exhibit, which the Project is conditioned to implement. See CUP Condition of Approval No. 47. Moreover, CEQA Guidelines sections 15088.5 and 15162 and Public Resources Code section 21199 do not trump the principles of res judicata and collateral estoppel.

Comment No. C.5-3:

II. The RPFSEIR Continues to Provide Insufficient Analysis and Mitigation for Impacts to Western Spadefoot.

The RPFSEIR did not substantially address concerns raised in the Center's May 29, 2025 comment letter regarding the PRDSEIR related to the importance of the western spadefoot (referred to as "WST" in the RPFSEIR) population present at the Project site, the interpretation of previous studies, the uncertainty of success for artificial pools providing adequate breeding habitat, or the importance of connectivity. Instead, the RPFSEIR's primary response is to explain that the Habitat Mitigation and Monitoring Plan ("HMMP") has been approved by CDFW (RPFSEIR 2-28, 29). The RPFSEIR further claims that our previous comment "provides no credible evidence of a potential significant impact not already addressed in the WST analysis or fully mitigated to CDFW's satisfaction."

On the contrary, the Center's May 29, 2025 comment letter explains the uncertainty around long-term success of artificial breeding pools, the importance of redundancy given recent history of drought in California, and the importance of landscape connectivity, as restated below. Regardless of CDFW's approval, the EIR fails to respond to the comment or address the concern, as detailed below.

Response to Comment No. C.5-3: The RPFSEIR fully addressed CBD's May 29, 2025 comments regarding WST. With respect to long-term success with WST mitigation, RPDSEIR provides the following at page 2-24:

> **Rationale For Expecting Success With Mitigation**
>
> As noted in the WST Report, and summarized herein, WST has shifted habitat use in portions of California from vernal pools to artificial ponds such as stock ponds and other ponding features of anthropogenic origin, many of which have created WST breeding areas quite by accident. As such, any assertions that it is difficult to create ponds that are suitable for WST breeding are not necessarily accurate. GLA has been involved in WST habitat creation projects that have been successful and provided an example of one such effort that has been well-studied since the seasonal ponds were created in 2005 and 2006 on Irvine Mesa in an area known as East Orange, which is now part of the Orange County Central Coastal Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) Reserve. The 15 created pools overall achieved performance standards after six years of monitoring and included breeding WST in eight of the pools as of the 2009/2010 rainfall season. It is important to note that the

performance standards included a number of components that were focused on the quality of the created pools and included hydroperiod (length of ponding) as it was recognized that this is clearly the most critical component of WST pond creation. Presence of fairy shrimp, a common food source for WST larvae were an important pool component and these along with the egg masses and larvae were introduced from the impact pools to the created pools. It was understood that pools with the proper characteristics would ultimately support WST. Thus, the results of follow-up studies conducted up to seven years following completion of the initial program, showed that WST had expanded to 12 pools within the 15-pool complex. Importantly, even in a drought year the pools exhibited sufficient ponding for breeding, though as is often the case for WST in such years, desiccation resulted in the loss of many tadpoles. Revised MM 5.2-9, below, is based on GLA's expert and successful experience in creating ponds that are suitable for WST breeding. The Western Spadefoot Toad Impact Assessment and Habitat Mitigation and Monitoring Plan, which is incorporated into revised MM 5.2.9, also includes a ten-year monitoring and maintenance program and contingency measures that would be implemented should WST translocation of inoculum not be on a trajectory for meeting the final success criteria.

Thus, there is no uncertainty regarding long-term success of artificial breeding pools. It is speculation to assume that the onsite pools will not be successful. CEQA does not require the analysis of speculative impacts. (CEQA Guidelines Section 15145.) The HMMP provides detailed performance criteria for both success criteria for the onsite ponds and contingency site criteria should additional pools be required. (See RPFSEIR Response B.4-25 and B.4-27.) And as noted, both the County Biologist and CDFW reviewed and approved the WST Report and mitigation.

Comment No. C.5-4:

A. The RPFSEIR Continues to Minimize the Importance of the Project Site for Western Spadefoot.

The RPFSEIR continues to minimize the importance of the western spadefoot population present at the Project site. The RPFSEIR includes no changes regarding western spadefoot analysis and impacts. As such, the RPFSEIR continues to claim that "WST populations are not rare in the nearby areas." (WST Plan, p.7). As described in our previous letter, this claim is contrary to the Applicant's own description in the 2017 Draft Supplemental Environmental Impact Report ("DSEIR"), which states that "the Grasshopper Canyon population is one of few known populations in the region" (DSEIR p. 5.2-36) (and which is quoted in a June 15, 2017 comment letter submitted by CDFW). The claim is also contrary to available evidence regarding the presence of western spadefoot in the region and the current status of western spadefoot populations.

As described in the May 29, 2025 comment letter, we conducted a query of the California Natural Diversity Database ("CNDDB") western spadefoot occurrences on May 21, 2025 including the Mint Canyon, Newhall, Val Verde, and Whitaker Peak, and San Fernando 7.5 Minute Quadrangles ("quads") (note that we included additional quads that were further from the Project site than those displayed in the PRDSEIR to capture the entire Santa Clarita Valley). Our search resulted in 44 total observations, including those at the Project site in the Whitaker Peak quad. Of these observations, only 10 had occurrence ranks (a ranking of the quality of the habitat and the condition of the population at that location) of "Good" or "Excellent;" 10 others were "Fair," 10 were "Poor," 14 were "Unknown" and one was "Possibly extirpated." The CNDDB results therefore do not necessarily indicate a healthy, widespread population—rather, they show that western

spadefoot do occur in the area, but while numerous populations appear healthy, numerous others are likely struggling. Importantly, many of the populations in and around the Santa Clarita Valley are highly fragmented and surrounded by roads and development. Such urbanization and development reduce regional and local connectivity across the landscape, isolating these remaining populations. When isolated populations experience years with low reproductive success or become locally extirpated, recovery is difficult because they no longer have adjacent subpopulations to supply individuals and boost the population or facilitate re-establishment. Therefore, urban development that destroys remaining habitat and continues to fragment dwindling spadefoot populations leads to higher risks of local and regional extinction (Neal et al., 2020). We do not dispute the fact that western spadefoot occur south and west of the project, but this does not mean they are common, and it certainly does not mean they are free from risk of regional decline.

Additionally, the population at the Project site lies in an important location in the species' range, considering western spadefoot biogeography. Western spadefoot in Southern California (south of the Transverse Ranges) are genetically distinct from western spadefoots in central and northern California (Neal et al., 2018). The western spadefoot present in the Project area belong to the southern population. As detailed in a recent Center petition to list western spadefoot as threatened or endangered under CESA, the southern population has experienced more severe declines than the northern population (although both populations have been heavily impacted by habitat loss and continue to decline) (Prado-Irwin, 2025). The population present at the Project site lies at the northernmost extent of the southern western spadefoot population. If the western spadefoot population currently present at the Project site is lost, the range of the southern population will shrink, furthering the pattern of regional decline.

Importantly, very little suitable habitat remains in Los Angeles County or surrounding counties (Rose et al., 2022), so fully protecting the habitat that remains—especially occupied habitat like that which occurs at the Project site–is essential. The Project site represents the last large, undeveloped, core habitat for western spadefoot in the entire County. Thus while the PRDEIR is correct in observing that other populations occur in and around the Santa Clarita Valley, it is important to recognize that this does not diminish the importance of the population at the Project site, especially considering the intact habitat present at the Project site, the lack of suitable habitat in the rest of the County, and the population's position at the northern edge of the southern population's range.

Response to Comment No. C.5-4: The presence of WST on the project site is not minimized. An additional WST surveys were conducted that confirmed the results of prior surveys. The WST mitigation reduces impacts to less than significant, which both the County Biologist and CDFW agreed with and approved. CEQA requires a good-faith, reasoned analysis, as was done here. The lead agency is not required to conduct every study suggested by a commenter. Commenter provides no credible evidence of a significant WST impact or inappropriate mitigation.

Comment No. C.5-5:

B. The RPFSEIR Still Fails to Provide an Adequate Baseline Regarding Western Spadefoot Presence.

In addition to the issues described above regarding the importance of the western spadefoot population at the Project site, the RPFSEIR also fails to provide sufficient information to establish a reliable environmental baseline at the Project site regarding potential western spadefoot habitat and western spadefoot presence.

The WST Plan states that “WST was observed on the NorthLake Project site during various general and focused amphibian surveys as well as during focused surveys for listed fairy shrimp within seasonal pools” and “While numerous ephemeral ponds and features have been observed on the Project site over time with respect to various surveys for different species, at no time have more than 3 features been observed to contain WST and one additional feature was observed to contain potential WST habitat, despite no WST being observed.” (WST Plan, p. 7).

Importantly, the analysis of suitable habitat for western spadefoot was initially extrapolated from surveys for suitable habitat for fairy shrimp, as stated in the WST Plan: “A determination for the extent of suitable habitat for WST is possible from the data collected during wet-season fairy shrimp surveys in 2004/2005, which was one of the wettest rainfall years in the last 50 years” (WST Plan, p. 8). However, fairy shrimp and western spadefoots do not have the same habitat requirements. Fairy shrimp generally occupy clay-pan vernal pools. Western spadefoots occupy these types of pools as well, but can also breed in many other temporary water bodies, including ditches, erosion cuts, road ruts, and ephemeral streams (Baumberger et al., 2019; Stebbins, 2003).

The WST Plan goes on to state that “In 2014, surveys for fairy shrimp and amphibians, were conducted” (WST Plan, p. 9) but fails to provide any details on survey methodology. It is unclear whether the 2014 surveys used the same methods as the 2004/2005 surveys, in which case non-vernal pool habitats would likely be overlooked, or used a different methodology. Further, the WST Plan provides no information regarding the geographic scope of either survey (2004/2005 or 2014). It is completely unclear whether the entire site was even surveyed for western spadefoot. If indeed the surveys were based on methodology intended to identify vernal pools, they would likely have excluded higher elevation areas or habitats like Grasshopper Creek and temporary pools along eroded areas or defunct roads.

If additional suitable breeding pools do exist at the Project site, based on the survey methodology, it is likely that they would not have been detected. Surveys focused on fairy shrimp in 2004/2005 would have likely excluded water bodies that contain suitable western spadefoot habitat but were not suitable for fairy shrimp. And surveys in 2014, which did target western spadefoot, would not necessarily have detected additional pools due to the “lower-than-average rainfall” that year (WST Plan, p.9). Aside from the lack of detail on the area surveyed, the survey methodology simply does not guarantee that all suitable western spadefoot habitat would have been detected.

Additional temporary waters could occur in many geologic features throughout the Project site, including along small canyons or areas with sandstone erosion, along defunct access roads, and especially in the upstream areas of the ephemeral Grasshopper Creek that experience low and intermittent flows. Given the fact that western spadefoot occupy upland habitat up to 600 meters away from breeding pools (Halstead et al., 2021), if ponding features are present across more of the Project site than presented in the WST Plan—which is likely given the landscape—much of the Project site would present suitable habitat and could be occupied by western spadefoot. However, because the RPFSEIR does provide any detail on how much of the Project site was surveyed, when it what seasons the surveys occurred, or what the climatic conditions of the site were during these surveys, it is impossible to know the extent of the western spadefoot population. It is entirely possible that western spadefoot are much more common throughout the Project site than the RPFSEIR claims, in which case the impacts to this sensitive species from Project construction and operation would be highly significant and potentially catastrophic.

Under CEQA, an environmental review document must evaluate the potential

environmental impacts of the project as compared to the existing environmental conditions (the "baseline"), so that the Project's impacts can be meaningfully analyzed and compared to alternatives. (CEQA Guidelines § 15125(a); see County of Amador v. El Dorado County Water Agency (1999) 76 Cal.App.4th 931, 952; Neighbors for Smart Rail v. LA County Metropolitan Transit Authority (2013) 57 Cal.4th 310, 315.) The information provided in the RPFSEIR regarding the presence of suitable western spadefoot habitat does not meet this standard.

Response to Comment No. C.5-5: The Project Site has been subject to multiple surveys for WST as well as for other species that have noted the presence or absence of WST. The commenter ignores the recent WST surveys conducted in 2023 and 2024 (RPDSEIR Appendix I), which confirmed the prior survey results. The commenter speculates that additional locations could contain WST, but provides no credible evidence of such locations. (CEQA Guidelines Section 15145.) See also RPFSEIR Responses B.4-25 – B.4-31.

Comment No. C.5-6:

C. The Proposed Mitigation for Impacts to Western Spadefoot Remains Insufficient.

As we described in the May 29, 2025 comment letter, the mitigation for impacts to western spadefoot in the form of mitigation ponds is improved from previous environmental review documents, but is still not sufficient to ensure long-term population persistence.

The RPFSEIR claims that "it is speculation to assume that onsite pools will not be successful and thus additional ponds at different locations will be needed." (RPFSEIR at 2-29). However, we do not assume the onsite pools will not be successful without evidence. Rather, the evidence cited in the PRDEIR itself shows that success rates of artificial pools are not 100%. Based on the results of the study conducted by Baumberger et al (2020) and referenced in the PRDSEIR, it is entirely reasonable to expect that some pools may not be successful.

As we wrote in our previous comment letter, Baumberger (2020) investigated the success of artificial breeding pools that were created in 2006 as mitigation for impacts to ten breeding pools at a site in East Orange. The mitigation for this project included the creation of 21 pools to mitigate for the 10 affected pools, providing a total mitigation ratio of 2.1:1. Fifteen of these pools (which became 14 when two pools merged together) were in Irvine Mesa, and six were in Shoestring Canyon. In Shoestring Canyon, all six mitigation pools failed to hold water and breeding western spadefoot were completely absent from the pools and the nearby creek bed during the 2016 survey period (Baumberger et al., 2020). The PRDEIR omits this information, focusing only on the pools in Irvine Mesa, which had higher rates of success, thereby misrepresenting the success of the mitigation and making it appear to be more successful than it was.

Further, the PRDSEIR quotes the following excerpt of the study itself, claiming that this excerpt shows WST breeding in 12 of the 14 pools on Irvine Mesa (WST Plan, p.31):

> Twelve of the 14 mitigation pools at Irvine Mesa held water for >30 d. During our 2016 surveys, two of the mitigation pools built by Glenn Lukos Associates, Inc. merged (Pools 5 and 9) and we considered them as one pool (Pool 9). We detected *S. hammondii* tadpoles in eight of the Irvine Mesa mitigation pools but documented successful breeding through metamorphosis at only seven of these pools in April 2016 due to

desiccation and/or water quality.

However, the PRDSEIR misrepresents the findings of this study. This excerpt only says that 12 of the 14 pools held water for >30 days, but merely holding water does not necessarily mean that western spadefoot were breeding in those pools. In fact, the sentence following this excerpt states "*Spea hammondii* did not breed in all the pools with hydroperiods >30 d (Table 3)." (Baumberger et al., 2020). The excerpt itself states that tadpoles were only detected in eight of the pools, and breeding through metamorphosis was only observed at seven of the pools. It is difficult to understand therefore why the PRDSEIR claims that western spadefoot were breeding in 12 of the 14 pools in 2016, when the very excerpt they cite to support this statement says WST only bred in seven of these pools.

The PRDSEIR is misleading and falsely claims that the study's artificial mitigation pools were more successful during the drought year of 2016 than the reality. In fact, only ½ (7/14) of the pools in Irvine Mesa showed successful breeding in 2016, and 0/6 of the pools in Shoestring Canyon showed successful breeding, leading to an overall success rate of just 35% (7/20). Thus the mitigation ratio of 2:1 implemented in the study did not even successfully mitigate for the full impacts to the ten original pools.

The PRDSEIR notes that the 2016 study occurred during a drought year, and that monitoring of the following 2016/2017 season showed tadpoles in 12 of the pools and "extensive breeding was present" (WST Plan p.31). The reference cited to support this claim is not published and is not publicly available (as far as we can ascertain), so it is impossible to determine whether the "12 pools" refers to pools in Irvine Mesa only or in Irvine Mesa and Shoestring Canyon, and therefore it is impossible to determine the overall efficacy of the mitigation during this "ideal" wet year. It appears likely that the study refers only to Irvine Mesa, in which case the population did show a notable increase in pool occupation, but the exclusion of Shoestring Canyon remains unexplained.

Given the variable conditions experienced by vernal pools including drought—which can last for years in California and is expected to become more common in the future (Diffenbaugh et al., 2015)—reliance on a simple 1:1 replacement, which is what the RPFSEIR does, is not sufficient to mitigate for impacts to breeding habitat by creating artificial pools.

The RPFSEIR should take into account the fact that, habitat loss and species displacement from construction of the proposed Project are immediate, while any gains from their mitigation are uncertain. Moilanen et al. (2009) found that "very high offset ratios may be needed to guarantee a robustly fair exchange" and that "considerations of uncertainty, correlated success/failure, and time discounting should be included in the determination of the offset ratio to avoid a significant risk that the exchange is unfavorable for conservation in the long run." Restoring complex ecosystems like ephemeral wetlands often results in reduced ecological function. In studies conducted in California on wetland mitigation sites permitted between 1979 and 2002, less than 20% of mitigated wetlands were performing optimally (Ambrose et al., 2006; Sudol & Ambrose, 2002).

Given the importance of vernal pools and associated upland (heterogeneous) habitat to western spadefoots and numerous other native, rare, and special-status animals and plants, connectivity, and overall biodiversity, the RPFSEIR should provide higher mitigation ratios. In addition, mitigation ratios need to take the types of mitigation to be implemented into consideration, as not all mitigation is created equal. Restoration, enhancement, and creation of habitats can have limited success due to the challenges of

establishing the appropriate hydrology when compared to preservation of existing habitats (Matthews & Endress, 2008; Stein et al., 2018; Sudol & Ambrose, 2002; Windmiller & Calhoun, 2007). Scientific studies specifically speak to the need for higher mitigation ratios (along with long-term monitoring, identified and measurable success criteria, and adaptive management strategies) to improve chances of adequately mitigating impacts to habitats and species (Matthews & Endress, 2008; Mitsch & Wilson, 1996; Moilanen et al., 2009; Stein et al., 2018; Sudol & Ambrose, 2002; Windmiller & Calhoun, 2007; Zedler & Callaway, 1999). The western spadefoot's continued survival relies on created wetlands having the appropriate hydrological and biological conditions and adequate upland habitat.

Given that western spadefoots have been extirpated from 80% of their range in Southern California (Stebbins & McGinnis, 2012; US Fish and Wildlife Service, 2005) and amphibian populations in the U.S. are declining at an alarming rate of almost 4% per year (Grant et al., 2016), a higher mitigation ratio than the approximate 1:1 ratio employed by the RPFSEIR is necessary.

Further, the proposed mitigation ponds are very clustered, unlike the current pond arrangement. Currently, the stock pond is approximately 4,000ft away from the seasonal ponds, which are all within approximately 100-400ft of one another (including VP-6/Pond 3) (WST Plan, Exhibit 4). However, the proposed mitigation ponds are all clustered very close together on the west side of the property, within 50ft of one another (WST Plan, Exhibit 5). The PRDSEIR claims that "total acreage as opposed to number of ponds is all that is relevant" (WST Plan, p.18). However, this claim does not consider the importance of landscape connectivity and potential metapopulation dynamics.

The natural history of western spadefoots makes them vulnerable to climate and habitat disturbances. Given the variation in geology, hydrology, climate, and habitat across a landscape, if one population declines or becomes extirpated, it is possible that others nearby can survive and re-colonize. Importantly, high pool density per se is not a problem. We acknowledge that high density of a pool complex can be quite beneficial for connectivity between pools and vernal pool complex hydrology. However, in placing the planned vernal pools so close to one another, and only creating two vernal pools, the Project design has minimized the amount of upland habitat available around the vernal pools and decreased the likelihood of population resilience in the case of an extreme disturbance. If the ponds are clustered, any extreme climatic events or random disturbances are likely to impact all of them in similar ways. On the contrary, if ponds are more spread out across the landscape, the local population is more resilient to random disturbance and potential climatic, hydrological, and ecological changes as well. The RPFSEIR does not address this point at all, and continues to claim that creating two ponds clustered close to one another is sufficient to maintain the spadefoot population at this site. The RPFSEIR fails to consider the importance of redundancy and landscape connectivity to population resilience, especially for a demographically unstable species like western spadefoot. Their high demographic instability makes them particularly sensitive to habitat alterations that may interfere with recolonization and reestablishment after unsuccessful recruitment years (Fisher & Shaffer, 1996).

Western spadefoot populations are often able to persist in the face of environmental variability due to metapopulation connectivity; when one population experiences decline, migrants from surrounding populations can bolster the population and prevent local extirpation. As climate change impacts become more severe and extreme weather events continue to occur, shifts in hydroperiod and increased temperatures expected to become more extreme (Montrone et al., 2019; Pyke, 2004; Thomson et al., 2016), and such population dynamics are likely to be increasingly

important for species persistence. Due to reduced connectivity between suitable habitats, populations that are unable to successfully breed may decline and disappear and will be unable to be re-established by neighboring populations, leading to further permanent species decline. It is therefore highly important to consider habitat connectivity between upland and aquatic habitat as well as between different pools and pool complexes.

In Southern California, western spadefoot populations have become extremely fragmented, and persistence of remaining subpopulations of is fragile (Halstead et al., 2021; Neal, 2019; Neal et al., 2020). Additionally, it is more important than ever to prioritize climate resiliency as both drought and extreme storms become more common in California (Diffenbaugh et al., 2015; Swain et al., 2018).

The proposed mitigation therefore remains insufficient because a) the mitigation ratio is too low, and does not provide sufficient replacement habitat in the form of artificial pools and b) the ponds are too close together, increasing the risk of extirpation compared to more dispersedaquatic habitat. The RPFSEIR thus fails to adequately analyze or mitigate impacts to western spadefoot.

Response to Comment No. C.5-6: As noted above, the WST Report and mitigation were approved by the County Biologist and CDFW. While the commenter would prefer different mitigation, the commenter had not identified any inadequacy in the CDFW-approved mitigation. CDFW is the expert state agency with respect to this issue, and thus CDFW's approval of the mitigation (and WST Report) is substantial evidence upon which the County can rely. See also RPFSEIR Responses B.4-25 – B.4-31.

Comment No. C.5-7:

III. The RPFSEIR Dangerously Dismisses the Increased Ignition Risk and Harms to People, Communities, and Wildlife Due from the Project.

The RPFSEIR fails to adequately assess and mitigate the Project's impacts on wildfire risk, and the RPFSEIR's responses to the Center's comments regarding the Project's impacts to wildfire risk are insufficient. The responses mostly point to technical appendices D-1, D-2, and K, which lack adequate analyses and unsubstantiated conclusions. Neither the responses nor the appendices resolve the concerns raised in the Center's May 29, 2025 comment letter. Although Appendix D-1 acknowledges that "the expected fire behavior in the interface of the Northlake development indicates that the fire behavior could produce extreme fire behavior" (RPFSEIR Appendix D-1 at 5), the RPFSEIR somehow, and without providing substantial evidence or using the best available science, concludes that the Project's impacts to wildfire risk are less than significant.

Response to Comment No. C.5-7: The commenter makes claims of inadequate wildfire impact analysis but fails to identify any inadequacies in the impact analysis or supporting technical reports. The commenter fails to provide any credible evidence of a significant wildfire impact.

Comment No. C.5-8:

A. The RPFSEIR Overly Relies on Over-burdened Wildfire Protection Services and Resources.

The Project will put more families and structures in harm's way without adequate safeguards for their health and well-being. For example, the RPFSEIR skirts responsibility for when (not if) a fire occurs, stating, "[w]here fires are initialized within the Project Site

or near its boundary, the fire incident command and control will have to determine if the population will be moved or "sheltered in place"." (RPFSEIR Appendix D-1 at 5). The Project proponent essentially passes off responsibility for community safety to the County, which has repeatedly failed to keep residents safe from wildfire.

An after action review of the 2018 Woolsey Fire, which resulted in three deaths and more than 1,600 structures destroyed in Los Angeles and Ventura counties, identified that the responding agencies were "overwhelmed" by the fire's "speed and weight of impact" and lacked sufficient trained staff, clear policies and protocols, crisis communication, inter-agency and inter-jurisdictional collaboration, situational awareness, real-time data availability with coordinated response tools, emergency preparedness, and evacuation plans (Citygate Associates, 2019).These same issues have come up in other wildfire disasters throughout the state that occurred around the same time, including the 2017 Tubbs Fire (County of Sonoma, 2018) and 2018 Camp Fire (Constant Associates, 2020).

Despite these reports on lessons learned from fires that occurred seven years ago, the County of Los Angeles and likely many other counties have failed to make the necessary improvements. This is evident with the response to the Eaton and Palisades fires. The County was plagued with the same problems as previous fires, which led to fatal errors and destruction (Jarvie, 2025; McChrystal Group, 2025). Lack of funding, insufficient staffing, unclear and outdated evacuation protocols, limited firefighting resources, insufficient communications and alerts, and more resulted in the death of at least 31 people, the destruction of more than 17,000 structures, and the loss and upheaval of many communities that will be recovering for years to come.

The appendix provides "a simple decision tree for evacuation vs. protecting people in place" (RPFSEIR Appendix D-1 at 75). However, as detailed in the numerous incident reviews cited above, such decisions while navigating these crises are anything but simple, particularly at a time when wildfires are moving faster and climate change is amplifying extreme weather conditions and wildfire risk (Goss et al., 2020; Swain, 2021; Swain et al., 2018, 2025). The after action review of the Woolsey Fire states, "the size and speed of the Woolsey Fire, at times, outpaced the early efforts of some of the largest and most experienced and capable agencies in the United States" (Citygate Associates, 2019). The review also highlights the need to manage the public's "unrealistic expectations" of agency abilities to protect communities from fire, stating, "[w]e cannot expect that all population growth in Very High or High Fire Hazard Severity areas can be protected simply by increasing resiliency [hardening buildings, fuels treatment, and vegetation management] to wildfire and by adding more fire engines" (Citygate Associates, 2019). The RPFSEIR cannot rely on "fire incident command and control" to keep people safe from wildfire while adding to the burden by placing more people and structures in high fire-prone areas.

In addition, relying on sheltering in place if evacuation becomes infeasible has no basis in U.S. fire safety standards and cannot protect thousands of residents in a fast-moving wildfire. While some measures can reduce fire risk, they do not make structures or communities fire*proof*. Experts found that 56% of homes built to Chapter 7A fire-safety codes burned in the 2018 Camp Fire (Knapp et al., 2021). And such measures do not prevent structure-to-structure fire spread during extreme wind events (Knapp et al., 2021; Zamanialaei et al., 2025). Without population-level standards or evidence that thousands of residents could survive while trapped inside their homes or "safety zones" or "areas of refuge" to be identified after a fire has already been ignited (RPFSEIR Appendix D-1 at 76), sheltering in place cannot be an option.

The RPFSEIR also relies on a new fire station that may not ever get built. According to the appendix, "[a] site will be provided for a new fire station within the

development. In addition, the project will pay its proportionate fees for the construction of that station which will enhance the regional fire protection already in place" (RPFSEIR Appendix D-1 at 4). However, as mentioned in the Center's May 29, 2025 comment letter, there is no guarantee that a fire station would actually be built. And even if it were to be built, it is unclear if human and monetary capital will be sufficient to sustain and maintain a new fire station. There is no requirement that the developer pay for the county's costs of building or operating a station, nor is there any guarantee that sufficient firefighting personnel and equipment will be available. During the LA wildfires in January 2025, firefighters lacked enough personnel and fire engines to keep all communities safe (Fuller et al., 2025; Toohey & Fry, 2025). The personnel cost over the life of the Project (essentially forever) will likely be hundreds of millions of dollars. Funding is already lacking for the increasing costs of fire suppression and property damage from wildfires in California, and the developer is not required to reimburse the California Department of Forestry and Fire Protection (CalFire) for the many millions (or billions) of dollars CalFire will likely expense when (not if) Centennial needs to be defended from wildfire. The cost of fire suppression in areas managed by CalFire has skyrocketed from $114 million in the 2000-2001 fiscal year to close to $3 billion for the 2020-2021 and 2021-2022 fiscal years combined (CalFire 2022). The Legislative Analyst's Office (LAO) reported that CalFire used an estimated $3.3 billion for wildfire protection and suppression in the 2022-2023 fiscal year (LAO 2023). And as mentioned previously, climate change is amplifying extreme weather conditions and wildfire risk (Goss et al., 2020; Swain, 2021; Swain et al., 2018, 2025), which is making it more challenging to protect communities from wildfire. Such information must be analyzed when assessing wildfire risk.

This build now, deal with it later approach is no way to house Californians.

Response to Comment No. C.5-8: Commenter questions the expert Wildland Fire Risk Technical report and Evacuation Report, yet fails to identify any errors or provide any credible evidence of a significant wildfire impact. The Recirculated Partial Draft Supplemental Environmental Impact Report (RPDSEIR) wildfire analysis and the Wildfire Technical reports (RPDSEIR Appendices D-1, D-2 and K) comply fully with the requirements of CEQA and the California Attorney General's "Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act" guidelines. See RPFSEIR Response B.4-16 – B.4-24. The commenter speculates that the County's emergency services will not adequately respond to a wildfire and that the fire station may never be built, but provides no credible evidence of either.

Comment No. C.5-9:

B. The Project's Impacts to Wildfire Risk are Significant and Unavoidable.

The RPFSEIR erroneously concludes that the Project's impacts to wildfire risk are less than significant. The RPFSEIR states that the Center's May 29, 2025 letter "provided no credible evidence of a significant wildfire impact" (RPFSEIR at 2-27), which is false. We provided ample scientific evidence that is specific to California ecosystems and land use practices that unequivocally highlights that placing new developments in fire-prone habitats increases ignition risk. As mentioned in the Center's May 29, 2025 comment letter, reckless land-use planning that extends the wildlife-urban interface ("WUI") further into California's fire-prone landscape is causing fires to be more destructive. Almost all destructive wildfires are accidentally ignited by humans or human infrastructure near roads and development (Balch et al., 2024; Chen & Jin, 2022; Keeley & Syphard, 2018; Syphard et al., 2019).

According to a report from Governor Gavin Newsom's Office, construction of more homes in the wildland-urban interface is one of the main factors that "magnify the wildfire threat and place substantially more people and property at risk than ever before" (Governor Newsom's Strike Force, 2019). Another 2019 study found that housing and human infrastructure in fire-prone wildlands are the main drivers of fire ignitions and structure loss (Syphard et al., 2019). Sprawl developments extending into habitats that are prone to fire have led to more frequent wildfires caused by human ignitions, like power lines, arson, improperly disposed cigarette butts, debris burning, fireworks, campfires, or sparks from cars or equipment (Alexandre, Stewart, Keuler, et al., 2016; Alexandre, Stewart, Mockrin, et al., 2016; Balch et al., 2017; Bistinas et al., 2013; Keeley et al., 1999; Keeley & Fotheringham, 2003; Keeley & Syphard, 2018; Radeloff et al., 2018; Syphard et al., 2007, 2012, 2019).

Yet the RPFSEIR dismisses this established science, simply stating "Appendix K (Wildland Fire Risk Report Northlake Project Addendum #1) specifically addresses risk from new human presence in high fire-prone areas and the wildlife-urban interface (WUI) and concluded that "the increased wildfire risk from human-ignited wildfire is less than significant"" (RPFSEIR at 2-27). However, upon inspection of Appendix K, the RPFSEIR fails to provide credible evidence that supports their conclusions. The appendix seemingly avoids recent California studies, opting instead to highlight one 2009 California study and a few studies conducted in central Texas and Canada to argue that "at a point of development density, wildland fuels are reduced/eliminated or fragmented to a point where fire suppression effort are more effective" (RPFSEIR Appendix K at 2). However, this rationale is false and dangerously misleading. Although previous studies have found that low to intermediate development density surrounded by vegetation had the greatest risk of burning in a wildfire (*i.e.*, Syphard et al., 2012), more recent analyses show that once structures ignite in high-density development, there is an increased risk of fire through structure-to-structure spread (Knapp et al., 2021; Mockrin et al., 2023; Zamanialaei et al., 2025). Wildfires in the WUI since 2017 demonstrate this falsehood. High density development was extremely vulnerable and many lives and homes were lost in Santa Rosa, Paradise, Palisades, and Altadena in the 2017 Tubbs Fire, the 2018 Camp Fire, the 2025 Palisades Fire, and the 2025 Eaton Fire, respectively. To dismiss these horrific tragedies is a complete failure to analyze relevant information that is necessary to keep communities safe. The RPFSEIR endangers families by ignoring glaring truths and excluding analyses of these recent California wildfires.

Response to Comment No. C.5-9: See response to comment above. The commenter fails to provide any credible evidence of a significant wildfire impact.

Comment No. C.5-10:

C. *Wildfire in the Wildland Urban Interface Leads to Harmful Air Quality and Health Impacts*

The RPFSEIR fails to adequately respond to the Center's comments regarding how wildfires in the WUI cause poor air quality and therefore harm people, stating the following:

> "[c]ommenter speculates that an unintentional wildfire in the Project Area would result in poor air quality; none of the commenter's citations are Project Site specific. CEQA does not require the analysis of speculative impacts. (CEQA Guidelines Section 15145.) Commenter provided no credible evidence of a significant wildfire impact" (RPFSEIR at 2-27).

This is false. Such impacts are not mere speculation. Providing evidence that is site-specific to Northlake is unnecessary. When unintentional wildfires occur, science and experience show (and common sense dictates) that burning vegetation and structures filled with toxic metals, plastics, and other hazardous chemicals release $PM_{2.5}$ and toxic smoke, and such air pollution harms people. Numerous scientific studies provided with the Center's May 29, 2025 comment letter support the fact that wildfires result in an increases fine particulate matter ($PM_{2.5}$) exposure, which has been found to have severe health effects, including respiratory and cardiovascular symptoms; higher rates of dementia, cancer and other serious disease; and premature death. Other studies have found that toxic smoke from building structures can travel more than 150 miles. For more details and citations see the Center's May 29, 2025 comment letter and Section D: Wildfires in the Wildland Urban Interface Harm People and Wildlife. The RFPSEIR fails to adequately assess the Project's impacts to wildfire risk and the impacts of ignition to air quality and human health.

Response to Comment No. C.5-10: The commenter is incorrect that the comment regarding air quality was not responded to. RPFSEIR Response B.4-22 specifically addressed this issue:

> Commenter raises concerns regarding unintentional wildfires and associated air quality. Addendum #1 to the Wildland Fire Risk Report specifically addresses risk from new human presence in high fire-prone areas and concluded that "the increased wildfire risk from human-ignited wildfire is less than significant." (RPDSEIR Appendix K at page 7.) Moreover, the RPDSEIR concludes that "Neither construction nor operation of the Project would exacerbate wildfire risks, thereby exposing occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire." Commenter speculates that an unintentional wildfire in the Project Area would result in poor air quality; none of the commenter's citations are Project Site specific. CEQA does not require the analysis of speculative impacts. (CEQA Guidelines Section 15145.) Commenter provided no credible evidence of a significant wildfire impact.

Comment No. C.5-11:

D. Wildfires in the Wildland Urban Interface Harm People and Wildlife

The RPFSEIR must consider that when wildfires burn through communities, they threaten homes, livelihoods, lives, and health. In addition to the immediate impacts of lives and homes lost, evacuations and displacement, impacts from air pollution, soil contamination, lost jobs, and the trauma of escape and recovery extend well beyond the fire footprint and last long after the fire is extinguished. Impacts to wildlife are also potentially long-lasting. The RPFSEIR downplays and dismisses the serious and cascading consequences of more wildfire in the WUI and continues to lack adequate wildfire analyses and mitigation.

i. Wildfire Impacts Disproportionately Affect Low-income, Minority Communities

Impacts of wildfire disproportionately affect vulnerable communities with less adaptive capacity to respond to and recover from hazards like wildfire. Low-income and minority communities, especially Native American, Black, Latinx, and Southeast Asian communities, are the most marginalized groups when wildfires occur (Davies et al., 2018).

Those in at-risk populations (*e.g.,* low-income, elderly, disabled, non-English-

speaking, unhoused) often have limited resources for disaster planning and preparedness (Richards, 2019). Vulnerable groups also have fewer resources to have cars to evacuate, buy fire insurance, implement fire-resilient retrofits, maintain defensible space around their homes, or rebuild, and they have less access to disaster relief during recovery (Davis, 2018; Fothergill & Peak, 2004; Harnett, 2018; Morris, 2018; Ong, Pech, Frasure, et al., 2025; Richards, 2019; Vives & Castillo, 2025). And survivors are left without resources to cope with the death of loved ones, physical injuries and emotional trauma from the chaos that wildfires have inflicted on their communities.

Emergency services often miss at-risk individuals when disasters happen because of limited capacity or language constraints (Richards, 2019). This was the case for both the Palisades and Eaton fires. Many elderly and disabled community members unable to evacuate on their own were left stranded as the wildfires advanced, and the median age of those who died in the fires was 77 (Ellis, 2025; Jarvie et al., 2025). Meanwhile, delayed evacuation alerts and limited fire trucks in western Altadena, a predominantly Black and Latino neighborhood, resulted in 18 of the 19 deaths from the wildfire (Castleman, 2025; Ellis & Greene, 2025; Toohey & Jarvie, 2025).

In the aftermath of wildfires and other environmental disasters, news stories have repeatedly documented the lack of multilingual evacuation warnings leaving non-English speakers in danger (Axelrod, 2017; Banse, 2018; Gerety, 2015; Ong, Pech, Ong, et al., 2025; Richards, 2019). This was exemplified during the Eaton and Palisades fires; evacuation alerts were only sent in English and Spanish, leaving more than 12,000 Asian Americans with limited English proficiency in the evacuation zones without potentially life-saving information (Ong, Pech, Ong, et al., 2025).

Health impacts from wildfires can have both acute and long-term health effects that disproportionately affect vulnerable populations, like children, the elderly, pregnant women and fetuses, those with underlying chronic disease, low-income communities, and communities of color. A recent study found that wildfire smoke now accounts for up to 50% of ambient fine particle pollution ($PM_{2.5}$) in the western United States (Burke et al., 2021).

Increased exposure to fine particulates in wildfire smoke has been linked with increased hospital visits for respiratory symptoms (*e.g.*, asthma, acute bronchitis, pneumonia, or chronic obstructive pulmonary disease) and cardiovascular symptoms (*e.g.*, congestive heart failure, ischemic heart disease, and myocardial infarction) (Delfino et al., 2009; Künzli et al., 2006; Liu et al., 2015; Rappold et al., 2012; Reid et al., 2016; Viswanathan et al., 2006). It has also been linked to higher rates of dementia (B. Zhang et al., 2023; Z. Zhang et al., 2023). And experts have also found that greater exposure to wildfire smoke and excessive heat during the month before conception and the first trimester of pregnancy is linked with greater risk of both short-and long-term health problems (Evans et al., 2022; Khalili et al., 2025). Researchers estimated that between 2008 and 2018 more than 50,000 premature deaths were caused by California wildfire smoke (Connolly et al., 2024). As climate change intensifies, scientists predicted that wildfire smoke could cause approximately 700,000 excess deaths between 2025-2055 (Qiu et al., 2025).

Wildfires in the WUI can lead to other harmful public health impacts due to increased exposure to toxic contaminants from burned buildings, cars, electronics, and more. Buildings and infrastructure often contain plastic materials, heavy metals, benzene, and carcinogenic gases.

These toxic chemicals pose a threat in the burn area and they can travel long distances. During the 2018 Camp Fire that burned 19,000 structures, the smoke caused dangerously high levels

of air pollution in the Sacramento Valley and Bay Area and the California Air Resources Board found that high levels of heavy metals like lead and zinc traveled more than 150 miles (CARB, 2021). And unsafe levels of lead, arsenic, and other dangerous metals have been documented in and downwind of the Eaton and Palisades fire footprints (Champlin, 2025; Smith & Briscoe, 2025).

Families living or working in or near the burn area also risk increased exposure to hazardous chemicals. After the Eaton Fire, some families with no other options returned to live in homes deemed "uninhabitable" by insurance companies, surrounded by toxic debris (Vives & Castillo, 2025). Almost 50% of schools where students had returned to in the Pasadena Unified School District had elevated levels of lead and arsenic in their soils due to toxic ash, which can have damaging effects on the nervous system, cardiovascular system, and kidneys (Haggerty & Briscoe, 2025). And farmworkers often have to continue working while fires burn and pollutants fill the air, or risk not getting paid (Herrera, 2018; Kardas-Nelson et al., 2020; Parshley, 2018). Wildfire victims have also had to deal with lack of funding and support for cleanup as well as improper cleanup, "adding to the trauma" they have already endured (Briscoe, 2025; Briscoe et al., 2025).

Service workers also face increased risk. Firefighters are suffering disproportionately high rates of cancer and other serious diseases (Dreier, 2025; Hwang et al., 2023; Johnson & Lam, 2023) as well as mental health issues due to extended fire seasons and working extended shifts away from their families (Ashton et al., 2018; Bransford et al., 2018; Del Real & Kang, 2018; Greene, 2018; Gutierrez, 2018; Simon, 2018). And firefighters who fought blazes in the LA wildfires had high levels of lead and mercury in their blood, (Hernandez, 2025). Fire cleanup workers also risk increased exposure to harmful chemicals; they often do not use appropriate protective gear as they remove toxic debris from the burn area (Haggerty, 2025).

Scientists are continuing to uncover the devastating health impacts of wildfires in the WUI. In a study that included more than 1,100 participants that were affected by the 2023 wildfires in Maui, Hawai'i, researchers found that six to 14 months after the wildfires more than 20% of participants had reduced lung function and almost 50% had clinical symptoms of depression (Juarez et al., 2025). The majority of participants reported food insecurity, economic hardship, and displacement due to the wildfires (Juarez et al., 2025), and in the month of the wildfires, the suicide and overdose rate doubled (Purtle et al., 2025). Other experts attributed more than 400 additional deaths to the LA wildfires, likely due to poor air quality, delays in health care, and other factors (Paglino et al., 2025).

Science unequivocally shows that California wildfires in the WUI are increasing negative health impacts within and beyond their footprint. Proper analyses and mitigation of the Project's impacts on wildfire ignition, wildfire spread, and the negative health impacts associated with wildfire are needed. The RPFSEIR fails to accomplish this and is dangerously deficient.

Response to Comment No. C.5-11: As set forth in RPFSEIR Response B.4-24,

> Commenter claims the RPDSEIR (though it cites the SEIR) fails to adequately assess and mitigate the Project's impacts to wildfire risk, yet fails to identify an error or omission in the extensive analysis. Stating that "wildfire impacts disproportionately affect low-income and minority communities," while may be true, is not a critique of the RPDSEIR wildfire impact analysis and in no way undermines the RPDSEIR's analysis. Moreover, commenter fails to cite any guideline or requirement for the wildfire impact analysis to address "the aftermath of a wildfire." The RPDSEIR wildfire analysis and the Wildfire Report comport with the requirements of CEQA and the California Attorney General's "*Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California*

Environmental Quality Act" guidelines. Commenter submitted no credible evidence of a potential significant wildfire impact. See also Response B.4-22.

The commenter failed to submit any credible evidence of a potential wildfire impact.

Comment No. C.5-12:

ii. Wildfires in the WUI Threaten Vulnerable Wildlife

Wildfires are a natural and necessary process in many of California's ecosystems, and many areas need beneficial fire to restore ecosystem health and cultural connection to the land. However, the last decade of unprecedented wildfires in the wildland urban interface ("WUI") are pushing fragmented populations of sensitive species to the brink. Wildlife, including genetically isolated mountain lions, remnant populations of frogs and fish, resident and migratory birds, nearby marine life, and more are all vulnerable to direct and indirect impacts from wildfire. They can suffer burns, smoke-induced asphyxiation, heat stress, traumatic injuries, and death (Garcês & Pires, 2023). For example, two mountain lion deaths in the Santa Monica Mountains were attributed to the 2018 Woolsey Fire. Although mountain lions are highly mobile and generally able to move away from wildfires, these lions were unable to escape to safety because they were boxed in by roads and development. In addition, researchers found that after a large wildfire in an urbanized region, mountain lions avoided burn areas and increased risky behavior that could lead to more conflict with people, increased mortality, and extinction risk (Blakey et al., 2022). Such deaths can further destabilize small mountain lion populations that are already facing numerous other threats, including low genetic diversity, vehicle strikes and rodenticide poisoning, and make them more vulnerable to local extinction (Benson et al., 2016, 2019).

Smoke inhalation from wildfires can lead to negative health effects, like carbon monoxide poisoning, damage to lung tissue, and weakened immune response, in both terrestrial and aquatic wildlife (Sanderfoot et al., 2021). Smoke exposure can also cause shifts in animal behavior and stress levels, which could influence short- and long-term health and survival (Sanderfoot et al., 2021). One study found that increased smoke exposure led to decreased body condition (i.e., lower body mass) of wild birds in California, which suggests that they expend more energy while coping with sub-lethal health effects of smoke exposure (Nihei et al., 2024).

Heavy rains after wildfire can trigger landslides and debris flows that threaten small populations of sensitive, less mobile species that have been diminished due to habitat loss and fragmentation from sprawl development, dams, disease, non-native predators, and other threats. After the 2020 Bobcat Fire, biologists were desperate to rescue remnant populations of yellow-legged frogs, Santa Ana suckers, unarmored threespine stickleback fish, speckled dace, arroyo chub and arroyo chub because they were concerned that post-fire debris flows due to winter rains would wipe out their populations in the fire zone (Sahagun, 2020). Biologists conducted similar rescue missions for the last-known populations of Southern California steelhead and northern tidewater gobies in the Santa Monica Mountains after the 2025 Palisades Fire (Seidman, 2025a, 2025b, 2025c).

Historically, these species would have been able to recolonize from neighboring populations after the loss of individuals or populations to fire impacts. Unfortunately, that ability is now limited by the species' currently small and fragmented population structure. Continued alteration of historical fire regimes due to sprawl development will further endanger remnant populations.

Devastation caused by wildfire in the WUI is far-reaching and long-lasting. We have yet to uncover the full extent of harm such wildfires due to wildlife and the habitats they rely on, but it is certain that careless land use planning and policy are causing death and destruction in the natural world. The RPFSEIR fails to adequately assess and mitigate the Project's impacts on wildfire risk and how increased ignitions will impact biological resources.

Response to Comment No. C.5-12: See RPFSEIR Response B.4.21 and B.4.22. Commenter provided no credible evidence of a significant wildfire impact.

Comment No. C.5-13:

iii. The RPFSEIR fails to consider mitigation related to wildlife insurance for new residents and owners.

California is facing an insurance crisis. Many private insurers are leaving California or otherwise refusing to insure homes built in the wildland-urban interface (like the Proposed Project), and this has resulted in an addition of approximately one half of a *trillion* dollars of added assets being "covered" under California's FAIR Plan, which was designed to be a wildfire insurance of last resort for homeowners otherwise unable to obtain coverage (and is owned and managed by the State) (Saleh, 2025). In turn, this has caused a major uptick in premiums on the State's FAIR Plan, which has led some homeowners to forego wildfire insurance altogether. (*Id*.) And many of the homeowners that have been able to retain private wildfire insurance have been unable to actually be reimbursed through their insurers' claims process (Overland, 2025 [discussing litigation filed by victims of the recent fires in Los Angeles against their insurer for failing to pay out valid claims resulting from those fires]).

The RPFSEIR should therefore analyze whether the residences contemplated will be insurable through private insurers or will require access to the California FAIR Plan and what each home's premium ought to be. (*Laurel Heights Improvement Assn.,* 47 Cal. 3d at 392.) In undertaking that analysis, the Project proponent must also take into account that many private insurers have a documented practice of underinsuring homes when contracting for wildfire insurance, and that this practice of underinsurance has resulted in many homeowners receiving far less than their home's worth from their insurer after their homes are destroyed by wildfire (Neilson, 2025). Moreover, the RPFSEIR should include a mitigation measure requiring the Project proponent to financially cover the wildfire insurance for the homes being sold or otherwise disclose accurate and helpful information regarding the availability of private or public wildfire insurance, the costs thereof, and the risks inherent in obtaining such insurance and, more importantly, in foregoing to do so when advertising and selling the residences contemplated under the Proposed Project and Specific Plan. (14 C.C.R. § 15021(a).) In fact, the State is working on preparing and publishing a tool that would help facilitate that process (Rahim, 2025).

Response to Comment No. C.5-13: The commenter suggests that the wildfire impact analysis analyze the ability to obtain fire insurance. The Recirculated Partial Draft Supplemental Environmental Impact Report (RPDSEIR) wildfire analysis and the Wildfire Technical reports (RPDSEIR Appendices D-1, D-2 and K) comply fully with the requirements of CEQA and the California Attorney General's "Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act" guidelines. Social and economic issues are not within the purview of CEQA under CEQA Guidelines Section 15131.

Comment No. C.5-14:

IV. The County's Environmental Review of the Project's Significant Transportation Impacts Is Deficient.

This Project will increase regional vehicle miles traveled ("VMT'') by more than *one hundred million miles* each year, running against California's goals to reduce car-based lifestyles, vehicle accidents, greenhouse gas emissions, and air pollution. By building in the wildland urban interface far from existing services, this Project will entrench automobile dependence for the Project's residents for decades to come. The impacts from this enormous increase in car travel are significant and must be mitigated as such.

Providing alternatives to single occupancy vehicle travel is essential to building an efficient, sustainable and equitable transportation system. Unfortunately, the U.S. is far from achieving a multi-modal transit system, and projects like this move California even further from that target. In 2013, one study found that 76.4% of U.S. daily commutes were people driving alone (McKenzie, 2015). According to the EPA, the collective daily transportation in the U.S. constitutes about 27% of the total greenhouse gasses released (U.S. Environmental Protection Agency, 2017). California's annual average emissions associated with passenger vehicles between 2000 and 2020 was approximately 110 million metric tons of CO2 equivalent, or 25% of the state's total emissions. (CARB, 2022).

Increasing a region's VMTs isn't just bad planning, it also undermines community health. Increasing VMT increases emissions of air pollutants such as nitrogen oxides (NO_X), volatile organic compounds (VOCs), carbon monoxide, heavy metals, carbon dioxide and respirable particulate matter ($PM_{2.5}$). Increasing VMT also leads to more ozone (O_3) production through the photochemical reactions of NO_X and VOCs emitted by vehicles. (Fu et al., 2021). Short- and long-term exposure to several of these pollutants has been linked to premature mortality, compromised birth outcomes, heart disease and a host of respiratory illnesses (Mujtaba & Shahzad, 2021). Another serious direct impact of increasing the number of cars on roads, like the Project would do, is automobile crashes, which have historically been the leading cause of death among adolescents in the United States. (Goldstick et al., 2022 [showing vehicle crash as the top cause of death from 1999 to 2019, when firearm deaths narrowly surpassed vehicle deaths]). An estimated 42,915 people in the U.S. died in car crashes in 2021 alone and 3.4 million people are injured each year, which costs an estimated $473.2 billion annually as measured by wage and productivity losses, medical expenses, motor-vehicle damage, and employers' uninsured costs (Frumkin et al., 2004; U.S. Department of Transportation, 2022). The rate of deaths due to traffic has been increasing since 2013. (National Safety Council, 2026)

Beyond the direct impacts, increased VMT has long term impacts on commuters. In 2019, the duration of the average daily commute in the United States increased to a new high of 55.2 minutes, and a record 9.8 percent of commuters reported daily commutes of at least 2 hours (Burd et al., 2021). These long commutes reduce the amount of time that workers are available to spend with family, friends, and community. The increase in inactivity and isolation can also lead to long-term health complications such as pre-diabetes, diabetes, obesity, asthma, isolation, stress and depression (Ewing et al., 2003; Leyden, 2003). In contrast, developments that facilitate commuting my mass transit, foot, or bicycle increase people's overall activity level and health. (Sahlqvist et al., 2012).

Given the myriad public health problems associated with increased car dependance, it should be a priority of the County to reduce VMT with every new project, especially for projects as large as this. The County needs to continue investing—and

requiring project applicants to invest—in alternative modes of transportation to not only make multi-modal transit cheaper, quicker, and easier than passenger vehicle transit. Best practices for transportation options should include providing free public transit services for future residents and workers; implementing bus only lanes; optimizing bus routes to minimize overlap and ensure coverage across the city in line with demand; and providing high-frequency, reliable services with regular bus stops for easy access.

Studies indicate that free public transit services typically result in ridership increase from 20% to 60% in a matter of just a few months (Studenmund and Connor, 1982). Similarly, bus lanes that reduce total transit door-to-door travel times by 5%-15% will increase urban peak ridership 2%-9% (UCLA Institute of Transportation Studies, 2019). Lastly, ensuring accessibility and convenience is essential to increasing ridership. Providing more bus stops decreases the distance residents have to travel to access such services.

Instead of pursuing these common-sense solutions, this Project envisions continuing California's failed experiment of building car-centered infrastructure by creating a sprawling, low density, mass transit desert far from any existing services. This will result in the Project's residents being tethered to their cars for their every need for decades to come. The VMT analysis shows that the Project will induce over 100 million miles travelled per year. (RPFSEIR Appx. C-1 at 9.) This dramatic amount of automobile travel will result in an average of 1.38 of the Project's residents to die each year in vehicle accidents. (National Safety Council, 2026 [showing a death rate of 1.38 people per 100 million miles travelled].) Vehicle travel resulting from the Project will also emit 53,873 tons of CO_2 per year, 220 pounds of Nox per day, 657 pounds of carbon monoxide per day, and 237 pounds of particulate matter 10 per day. (Draft SEIR at 5.1-34, 5.7-26.) This Project will steer region in the opposite direction of local, county, and state policy, eroding community and environmental health to build yet more car-dependent infrastructure. The RPFSEIR fails to adequately assess and mitigate the VMT, GHG, air pollution impacts from the massive increase in car travel that will be caused by this Project.

Response to Comment No. C.5-14: The commenter claims the VMT analysis (and associated air quality and GHG impact analyses) are inadequate but fails to identify any errors or inadequacies. Most of the comment cites general information not related to the Project or its impacts. The commenter failed to submit any credible evidence of a VMT impact. Public Works reviewed and approved the VMT report and determination. (RPDSEIR Appendix C-2.)

Comment No. C.5-15:

A. The RPFSEIR'S VMT Analysis is Unsupported and Deficient

The County argues that this Project, which will add one hundred million VMT to the area's roadways each year, does not have a significant traffic impact. The Project's enormous VMT impacts are significant when compared to the County-established threshold. Yet instead of using its established threshold, the County instead used an inapposite environmental baseline and threshold of significance to preclude a finding of significance. These findings are not supported by substantial evidence. The County must recirculate the EIR to explain how it will mitigate its significant impacts to VMT.

Response to Comment No. C.5-15: The commenter questions the baseline used for the VMT analysis. The Project is a revision to the 1992 Project; as such, it is proper and legal to use the original project as the baseline for comparison. Public Works, the County's expert agency, approved the VMT report, including the methodology and impact determination. (RPDSEIR Appendix C-2).

Comment No. C.5-16:

i. The County Was Required to Perform a VMT Analysis in the RPFSEIR

Senate Bill 743, passed in 2013, amended CEQA to require lead agencies to replace the outdated level of service traffic metric with VMT. (See Guidelines § 15064.3). The level of service analysis focused on how a project would impact road congestion, a metric that does not factor in GHG emissions or air pollution. The purpose of SB 743 was to amend CEQA to be more "able to promote the state's goals of reducing greenhouse gas emissions and traffic-related air pollution, [while] promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations." (Steinberg, 2013). In other words, SB 743 aligns CEQA with California's climate goals by focusing the traffic analysis on how much a project will impact automobile use, rather than how a project will impact road congestion.

Though Senate Bill 743 was passed after the 1992 development was approved, CEQA requires the County to replace its outdated level of service analysis with a VMT analysis. CEQA Guidelines section 15007(b) states that "new requirements in amendments will apply to steps in the CEQA process not yet undertaken by the date when agencies must comply." This step in the CEQA process—the Revised Partial SEIR—could not have begun before the final judgment granting the Center's writ of mandate was filed by the Los Angeles County clerk. This filing occurred on February 1, 2021, well after the new VMT requirement took effect on July 1, 2020. (See Guideline § 15064.3.) As such, the VMT CEQA Guidelines apply to this RPFSEIR, and the County was required to redo its 1992 traffic analysis.

The County recognized this requirement and prepared a Transportation Analysis because the "level or service metric . . . is no longer the applicable metric for identifying significant impacts under CEQA." (RPFSEIR Appx C-1 at p. 1.) While the County appropriately decided to conduct this analysis, the analysis and its attendant findings were deficient.

ii. The Environmental Baseline Used in the VMT Analysis is Unsupported

The new traffic analysis found that VMT impacts were not significant. The County's conclusion is flawed for two reasons. First, the appropriate environmental baseline is the existing, undeveloped baseline. Instead, the Conty used the hypothetical baseline of the 1992 project at full buildout. Second, the threshold of significance chosen by the County is not supported by substantial evidence.

The County used the 1992 project and its 12,585 hypothetical residents as the environmental baseline, rather than the actual baseline, which is no residents. The County's attempt to obfuscate the significance of the Project's VMT impacts by inflating the environmental baseline violates CEQA. As evidenced thoroughly in the Center's May 29 letter, a foundational aspect of CEQA is to treat the *existing* environment as the baseline. The County provided no rebuttal to the abundant evidence provided by the Center, failing to cite a single case, provision of the Public Resources Code, CEQA Guideline, or County policy. Instead, the County relies on unsupported assertions that the previous project, which was never built, was not hypothetical.

Though the development had been approved in 1992, that approval does not constitute an acceptable baseline. The CEQA Guidelines and Supreme Court speak directly to this set of facts, detailing that permitted conditions are not the same as a CEQA baseline. The Guidelines detail that "an existing conditions baseline shall not include

hypothetical conditions, *such as those that might be allowed, but have never actually occurred*." (Guidelines § 15125(a)(3) [emphasis added].) The Supreme Court has held that "a long line of Court of Appeal decisions holds, in similar terms, that the impacts of a proposed project are ordinarily to be compared to the actual environmental conditions existing at the time of CEQA analysis, *rather than to allowable conditions defined by a plan* or regulatory framework." (*Communities for a Better Environment v. South Coast Air Quality Management Dist.*, 48 Cal. 4th 310, 320-321 [emphasis added].) Though the 34-year-old development approval set some "allowable conditions," those conditions never came to fruition. The "actual environmental conditions existing at the time of" this RPFSEIR are undeveloped land with no residences and minimal business activity. The environmental baseline must be set based on this reality, not the hypothetical project.

Using this appropriate, existing environmental baseline would undeniably lead to a finding of significance because the Project would add 275,141 VMT to the region each day compared to the negligible existing VMT associated with the Project area.

As described in the next subsection, even if the Project uses the generous Southern California Association of Governments environmental baseline of 22.3 VMT per capita, the Project will nonetheless result in significant VMT impacts.

Response to Comment No. C.5-16: See response to comment above. The commenter submitted no credible evidence of a VMT impact.

Comment No. C.5-17:

iii. The VMT Significance Threshold Used by the County is Unsupported

The appropriate threshold of significance of 18.5 VMT per capita has already been established by the County, yet the County failed to use this threshold for the Project.

Los Angeles County prepared a SB 743 Implementation and CEQA Updates Report ("County Guidance") in 2020 to help guide agencies through Senate Bill 743 VMT analyses for the purposes of CEQA review. This County Guidance sets the baseline VMT for North Los Angeles County, where the Project is located, for a residential project at 22.3 VMT per capita. (Los Angeles County, 2020, pp. 16, 30). The County Guidance sets the VMT significance threshold at 16.8% below this baseline. (Los Angeles County, 2020, pp. 16, 29). In this case, a 16.8% reduction from the 22.3 VMT per capita equals 18.5 VMT per capita. (Los Angeles County Public Works, 2020, p. 11).

The significance threshold of 18.5 VMT per capita is dramatically lower than the Project's 25.7 VMT per capita. (RPFSEIR Appx. C-1 at 9.) Since the per capita VMT will greatly exceed the County-established significance threshold for residential projects, the VMT impacts from the Project are significant and must be analyzed and mitigated as such.

Instead of using the County's own guidance for residential projects, the County declares that any decrease in VMT per *service population* compared to the 1992 project automatically results in insignificance. (RPFSEIR Appx. C-1 at p. 7.) As described in the County Guidance, VMT per service population is the correct metric only when a project is *not* a residential or office project. (SB 743 Implementation Report, 2020, p. 30). This is because VMT per service population is intended to include the VMT from both a development's residents and employees commuting to "service" the development's businesses. As such, the baseline for VMT per service population is higher than per capita because it includes these worker trips from outside the development.

Where, as here, a development has no businesses, this metric does not make sense. This Project is almost entirely residential, with only 22.9 acres of the 1329.7 acre Project zoned as commercial or industrial. (PRFSEIR at Ex. 1). Non-residential VMT makes up just 3.2% of the Project's overall VMT. (RPFSEIR Appx C-1 at 4 [showing commercial retail VMT at 3,670, recreation/park VMT at 2,640, and school VMT at 2,640].)

The County argues that the Project's impacts are not significant because VMT per service population decreased from 27 to 25.7 for the 1992 development compared to the 2018 Project. Yet the correct metric is VMT per capita, which is the exact same for both projects. The RPFSEIR must redo its analysis using this per capita metric rather than the unsupported per service population metric.

Response to Comment No. C.5-17: The Project is a type of land use plan (Specific Plan) and Section 3.1.3 – Impact Criteria of the County Guidance describes that total VMT per service population (the sum of residents and employees) is the appropriate metric to utilize for analyzing VMT impacts for a land use plan in the County. As the commenter notes above, the Project does include a mix of uses such as residential, retail, recreation/park and school uses, all of which would generate VMT. Therefore, VMT per service population is an appropriate metric to use of the VMT analysis. The comment accurately states that VMT per capita would be the same for both projects, which also would indicate a less-than-significant project impact in comparison to the previously approved project. The commenter questions the VMT analysis, claiming it was done incorrectly, yet failed to submit any credible evidence of a significant VMT impact. As noted in the responses above, Public Works, the County's expert agency, approved the VMT report including the methodology and impact determination. (RPDSEIR Appendix C-2).

Comment No. C.5-18:

iv. The Traffic Analysis's VMT Per Capita is Flawed

Beyond using an unsupported environmental baseline and significance threshold, the entire VMT analysis understates the amount of driving that the Project will cause. As noted in footnote 2 of the VMT and Service Population Calculation Worksheet, the only trips used in the analysis include "2 trips per employee (26.4 VMT per employee/2 trips per employee =13.2 miles." (RPFSEIR Appx C-1 at 9.) This meager VMT accounting ignores that the Project will require residents to drive to fulfill all their daily needs, not just to get to work. Unaccounted for are trips to the grocery store, to drop kids off at school, to medical appointments, to restaurants, to cultural and social events, and more. And since this Project sprawls into undeveloped lands without existing services, residents would need to travel miles to existing urban centers to fulfill these needs. If these unaccounted for trips were included in the VMT analysis, the overall VMT would no doubt be substantially higher As such, the VMT analysis is not supported by substantial evidence.

Response to Comment No. C.5-18: The "2 trips per employee" was used to estimate employee "commute VMT" for the Project's non-residential land uses (employees of the retail, recreation/park, and school). The trips the commenter notes above (resident trips shopping, dining, services, etc.) are accounted for separately in the "residential VMT". The residential VMT was estimated by using the residential population and the residential VMT per capita from the County's VMT tool. Per the County Guidance the residential VMT per capita captures Home-Based Work and Home-Based Other trip productions. Therefore, the VMT analysis does not understate the amount of trips. The commenter speculates that the VMT analysis understated the number/length of Project

trips, yet provides no credible evidence of a significant VMT impact. As noted above, Public Works, the County's expert agency, approved the VMT report, including the methodology and impact determination. (RPDSEIR Appendix C-2).

Comment No. C.5-19:

v. The RPFSEIR Fails to Incorporate All Feasible Measures to Mitigate VMT Impacts

Since the Project's VMT impacts are significant, the County must implement all feasible mitigation measures. The RPFSEIR fails to do so, requiring no mitigation for VMT. Even if the County succeeded in implementing the Project's "features that tend to reduce VMT" (which are not enforceable mitigation measures), the Project would still greatly exceed the VMT significance threshold. These features include building bike infrastructure (VMT reduction of 0.08%), expanding the transit network (4.6%), affordable housing (2.4%)[4], and pedestrian network (6.4%). Together, this would decrease VMT per capita by 13.4%, or 22.3 VMT per capita. This is number is still 20% higher than the significance threshold of 18.5 VMT per capita. Since the VMT would remain far above the significance threshold under any circumstance contemplated by the RPFSEIR, the County must consider all feasible measures to mitigate the Project's VMT impacts. Some of the short-term measures identified by the County in its guidance document, but not included in the RPFSEIR, include implementing a commute trip reduction program, providing ride-sharing programs, implementing subsidized or discounted transit programs, encouraging telecommuting and alternative work schedules, unbundling parking costs from property costs, implementing market price public on-street parking, providing traffic calming measures, and implementing car-sharing programs. (Los Angeles County, 2020, p. 34). The County guidance also identified two long-term mitigation measures, neither of which were contemplated by the Project. These measures include a VMT mitigation exchange and a VMT mitigation bank. (Los Angeles County, 2020, p. 36). The County must adopt enough of these additional, feasible mitigation measures to reduce the VMT per capita below the threshold of significance.

A decades-old EIR that fails to even calculate VMT is not sufficient to satisfy CEQA's requirements; the appropriate inquiry is "whether a proposed project or plan adequately reduces total VMT." (Los Angeles County Public Works, 2020). This Project clearly does not.

Response to Comment No. C.5-19: The commenter claims, without citing any credible evidence, that VMT impacts are significant and mitigation must be adopted. The VMT analysis, which Public Works approved, demonstrates that there is no significant VMT impact. The County is not required to impose mitigation measures where there is a less-than-significant impact. Applicable case law prohibits the imposition of mitigation measures unless they have a nexus to and are proportional to a project's significant impacts. (*Nollan v. California Coastal Comm.* (1987) 483 U.S. 825; *Dolan v. City of Tigard* (1994) 512 U.S. 374.)

Comment No. C.5-20:

V. Conclusion

The Center appreciates the Commission's consideration of these comments. Because the environmental review for the Project is inadequate for the foregoing reasons, the Center urges the Commission not to approve the Project unless and until these deficiencies are remedied.

[4] This reduction is based on a 28.6% decrease for the Project's 315 affordable units, assuming those units are multiple family residential units with an average of 2.79 inhabitants. (RPFSEIR Appx C-1 at 9.)

Given the possibility that the Center will be required to pursue legal remedies in order to ensure that the County complies with its legal obligations including those arising under CEQA, we would like to remind the County of its statutory duty to maintain and preserve all documents and communications that may constitute part of the "administrative record" of this proceeding. (Pub. Res. Code § 21167.6(e); *Golden Door Properties, LLC v. Superior Court* (2020) 53 Cal.App.5th 733.) Please include this letter and the provided references in the County's file for this Project, and continue to include the Center on the notice list for this Project using the contact information below.

Response to Comment No. C.5-20: This concluding comment is noted for the record and will be forwarded to the decision makers.

Response to Comment Letter C.6

Sydney Croasmun
Ridge Route Preservation Organization
January 27, 2026
Letter

Comment C.6-1:
In 1909, California was on the cutting edge of the Good Roads movement. $18 million of state bonds were passed to construct the revolutionary new highway system. Stagecoach roads would soon be a thing of the past and the automobile would take center stage.

When they set out to build the Ridge Route, they were entering uncharted territory. Built by a railroad contractor who believed in the future of the automobile, paved later by WW1 veterans with experimental road surfaces and designed with the purpose of uniting a rapidly splitting California. This road changed the course of history and eventually, its successor, the I-5, would become one of the most important trade routes in the country.

We say this to inform you that the Ridge Route isn't just another winding road. It has been a core part of our community since its opening in 1915 and a key part of our local history. Something worth honoring and protecting. While we understand that progress is inevitable, our organization exists to preserve what we can and document and recover what we can't.

Response to Comment C.6-1: This introductory comment is noted for the record and will be forwarded to the decision makers.

Comment C.6-2:

The proposed expansion of the Northlake Development will impact the Ridge Route, realigning 1.5 miles of the road and developing alongside nearly 4 miles of this historic corridor. Along the western border of the project site, hidden off to the edges of the road are C Blocks. Concrete markers placed by the California Highway Commission during the surveying and construction of the road (1913-1915) to mark the original right-of-way. The project site also covers the historic locations of "Queen Nell's Castle" - the homestead of Cornelia "Nellie" Martinez Callahan, and the Owl Garage. Both locations are no longer standing but could have artifacts such as bottles, plates and old car parts. Our organization would like to work with your archaeologists to ensure these markers and artifacts are collected and protected.

Of concern for the future, we worry about the impact of relying on one road to be the only exit for an entire community. The Ridge Route is no stranger to fires and the area was referred to as a "historic fire corridor" in the Northlake Environmental Impact Report. Fires reported at Templin Highway and the I-5 are ever prevalent. The project site burned in the 2022 Route Fire and was under evacuation as recently as the 2025 Hughes Fire. With the widening of the road to 4 lanes, there would now be two southbound lanes and one northbound lane available for evacuation and potentially only for 30 minutes in the case of the "Freeway Spot Scenario" (Northlake EIR).

It is out of concern for the future residents that we suggest looking into creating a secondary southern exit route for the community. Not only for evacuations, but to alleviate traffic on Ridge Route Road, which often functions as a bypass for the I-5 when there is an accident north of Castaic. Allowing residents to come and go unaffected by the freeway conditions.

Response to Comment C.6-2: Mitigation Measure 5.3-3 addresses the potential discovery of archaeological resources during Project construction:

> **MM 5.3-3**. For archeological sites accidentally discovered during future construction, there shall be an immediate evaluation of the find by a qualified archeologist. If the find is determined to be a historical or unique archeological resource, as defined under CEQA, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation shall be provided. Construction work may continue on other parts of the construction site while historical/archeological mitigation takes place, pursuant to Public Resources Code Section 21083.2(i).
>
> With implementation of this mitigation measure, Project impacts to archeological resources would be less than significant. The commenters request to work with the Project archeologists is noted for the record is and will be forwarded to the decision makers and the applicant.

Comment C.6-3: Ridge Route Road is classified as a Limited Secondary Highway. Therefore it can accommodate primary access for the Project's three access points.

The Recirculated Partial Draft SEIR (RPDSEIR) wildfire analysis and the Wildfire Technical reports (RPDSEIR Appendices D-1, D-2, and K) fully comply with the requirements of CEQA and the California Attorney General's "Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act" guidelines. The Wildland Fire Risk Report took into account years of meteorological data, including wind data. It determined that under all ten modeled fire scenarios, evacuation would take place within the allowable time limit.

Therefore, no additional Project access is warranted.

Comment C.6-3:

The Ridge Route Preservation Organization hopes to work with your archaeologist to preserve and honor our local history and encourage your developer to take measures to ensure the safety of future residents. Thank you for your time and consideration.

Response to Comment C.6-3: This concluding comment is noted for the record and will be forwarded to the decision makers.

Response to Comment Letter C.7

Miguel Luna
Santa Monica Mountains Conservancy
January 26, 2026
Letter

Comment No. C.7-1:

The Santa Monica Mountains Conservancy, a trustee CEQA agency, offers the following comments on the Partial Recirculated Final Supplemental Environmental Impact Report (PRFSEIR) for the proposed North Lake project. The PRFSEIR remains inadequate in multiple areas and must again be revised and recirculated. The mass-graded 33 million cubic yard project next to State Park land is an embarrassment to the County's efforts to balance housing development with open space protection. Many options remain for the County to reduce the project impacts without violating any State housing laws and still meet the Project Objectives.

Response to Comment No. C.7-1: The introductory comment is noted for the record and will be forwarded to the decision makers.

Comment No. C.7-2:

Both the proposed project and the Partial Creek Avoidance Alternative (PCAA) would irreparably and significantly degrade regional wildlife population connectivity across Interstate 5 by virtually blocking all access to a key, large box culvert under the adjacent southbound lanes of Interstate 5. Since the Court ruling on this project, in concert, Caltrans and the California Department of Fish and Wildlife have designated the subject section of Interstate 5 as a Priority Barrier to Statewide wildlife movement. The EIR-shown routes of how wildlife could reach this culvert from the project are a scientific fantasy forcing wildlife to travel a quarter mile on traffic noise and headlight saturated slopes, including Caltrans rights-of-ways, between the freeway and Ridge Route Road before crossing into habitat free of busy roads.

Response to Comment No. C.7-2: See Response to Comment C.4-3. The PCAA pulls the Phase 2 development boundary further south on the Project Site. Thus, Phase 2 development is necessarily further away from the wildlife crossing of I-5 between Marple and Grasshopper Canyons and will not deter wildlife from using this crossing. The northernmost portion of Phase 2, the area above the development line, will remain undeveloped. This is depicted on the PCAA Wildlife Crossing Exhibit, which the Project is conditioned to implement. See CUP Condition of Approval No. 47.

Comment No. C.7-3:

If the County insists on approving a project with this avoidable, regionally significant biological impact, the PCAA is far better for all other environmental impacts and the public welfare; and being the feasible Environmentally Superior Alternative should be the approved project. The upper half of Grasshopper Canyon would not need to be filled in with 10 million cubic yards of fill pulled from ridgelines.

Response to Comment No. C.7-3: LA County Planning has recommended that the PCAA, the environmentally superior alternative, be adopted as the proposed project. The applicant has agreed to that.

Comment No. C.7-3:

However, with the PCAA footprint remaining intact, a relatively minor adjustment to the northern

project access road can avoid this regionally significant biological impact. That access road can be moved to the south such that wildlife crossing Ridge Route Road to and from the box culvert would no longer have to navigate through a signalized, street lit intersection, a four-lane road, and a 100-foot-tall, manufactured slope with concrete v-ditches. The attached figure shows the problem with the existing access road location and where that new road alignment should go. This adjustment will add some grading and expense, but the Interstate 5 box culvert cannot be moved.

Response to Comment No. C.7-3: Commenter is incorrect that there is a regionally significant impact regarding wildlife crossings. The SEIR determined a less than significant impact on wildlife crossings. As set forth in RPFSEIR Response to Comment B.4-11, collateral estoppel bars relitigation of the mountain lion/wildlife movement and connectivity issues. See Responses B.4-1, B.4-3, B.4-5, and B.4-6. The Court Ruling denied all of the commenter's claims regarding mountain lions and wildlife crossings finding that "The use of the undercrossings by large animals was thoroughly discussed in the SEIR … The County had the best available information on the topic when it approved the Project in April 2019. The County's implied determination that the Project will not interfere with mountain lion crossings of the I-5 is supported by substantial evidence. (RPDSEIR Appendix A (Court Ruling), pages 19 through 21.)"

Comment No. C.7-4:

It is disturbing that both this proposed northern access road, commercial pads, and manufactured slopes for pads occur on Los Angeles County fee simple property. Private land use is proposed on public property (see attached figure). How is the County compensated? In addition, the grading for the access road as shown would put Mountains Recreation and Conservation Authority (MRCA) property (APN 3247-017-906) into a manufactured slope with no MRCA permission.

Response to Comment No. C.7-4: Comment does not raise CEQA issues. Comment is noted for the record and will be forwarded to the decision makers.

Comment No. C.7-5:

A key deficiency of the CEQA environmental analysis to date is the failure to first analyze and disclose the rarity and regional ecological importance of the large box culvert under the adjacent southbound lanes of Interstate 5 to allow inter-mountain range wildlife movement. The second failure is for both the proposed project and the Partial Creek Avoidance Alternative (PCAA) to adequately avoid eliminating the habitat directly across Ridge Route Road that all wildlife species need to access the wildlife tunnel with enough regularity. The callousness and inadequacy of the analysis to date is reflected in the concluding PRDSEIR paragraph:

> The cumulative impact on biological resources would be considered greater than the Project alone. However, when considering all the proposed and existing projects in the Project area, the previously approved Project contributes a relatively small portion of the impacts in the area due to its relatively small impact acreage, and the location adjacent to existing development. The Project is not expected to contribute a significant impact to the Project area. Incremental impacts would not be cumulatively considerable, and no additional mitigation is required.

The CEQA environmental analysis to date makes a mockery of the ecological importance of the project property and Grasshopper Canyon. A key example is that the analysis says it is just possible that mountain lions could occur in the area. That analysis omits the fact that mountain lions use and/or occupy any connected habitat in Southern California including fingers of habitat that protrude into residential and commercial areas. Without any scientific question by any expert, all the project area is prime mountain lion habitat.

The Mountains Recreation and Conservation Authority's (MRCA) 2020 photo capture of a State-

listed mountain lion using the large box culvert adjacent to the project site is new substantial evidence supporting the importance of the North Lake property to maintain wildlife movement between the mountain ranges bisected by the freeway. Since 2020 the MRCA has also photographed bobcats, mule deer, coyotes, and long-tailed weasels using this undercrossing.

The MRCA is overseeing a State-funded multi-year study of all the existing and potential wildlife crossings of Interstate 5 between Highways 126 and 138 which includes the subject project site and subject tunnel under Interstate 5. Another ongoing study has documented a lion roadkill and collared lion presence between the proposed development footprint and Interstate 5. That second study also documents extensive radio collared mountain lion movement approximately a mile north of the project site in the same large habitat block which is uninterrupted by a paved or public road. This is substantial new evidence that is growing by the month. It will be submitted into the public project record by other entities prior to the January 28, 2026 Planning Commission hearing.

If a project with 33 million cubic yards of grading that extends development over three miles into core National Forest and State Park adjacent habitat is not cumulatively significant given the breakneck pace of the urban transformation of the Santa Clarita Valley, then what project could possibly be so? It is an avoidable tragedy to wildlands and the viewsheds of many public viewing areas.

Response to Comment No. C.7-5: See Responses to Comment Letter C.4 (MRCA), above, and RPFSEIR Response to Comment B-5-2 regarding cumulative impacts.

Comment No. C.7-6:

The Conservancy urges the County not to certify the PRFSEIR. If the County does certify the PRFSEIR, the Conservancy urges that only the Partial Creek Avoidance Alternative be considered for adoption as the environmentally superior alternative. The County should balance new housing in the Specific Plan area with the needs of the existing greater public such as--traffic reduction, open space, wildfire prevention, viewshed protection, air pollution avoidance, water supply, landfills, and access to quality nature.

The best and completely weak argument in the PRFSEIR against the PCAA is that there would 37 less acres of active recreational area. What short sighted thinking. Instead there actually would be hundreds of more acres of usable natural open space, less onsite residents, and any lost recreational area could simply be integrated into the development footprint of the PCAA. The upper half of Grasshopper Canyon would not need to be filled in with 10 million cubic yards of fill.

Response to Comment No. C.7-6: See above response.

Comment No. C.7-7:

New substantial evidence to add to the record is the blow out of a high-pressure gas line at the end of 2025 within a few hundred feet of the proposed project. Human proximity to such a blow out could cause multiple deaths and injury. The EIR to date has failed to address the public safety hazard of adding more development and road traffic next to this fragile high pressure gas line. It has also failed to address the safety hazards of potential similar blow outs of the multiple fragile gas lines that must be relocated on the eastern project boundary as part of the proposed project and the PCAA.

Response to Comment No. C.7-7: Regarding the recent gas line rupture, Northlake Associates has been working cooperatively with Southern California Gas Company to provide access to Northlake-owned property allowing SoCalGas the ability to undertake immediate geotechnical investigations necessary to design and implement a permanent repair solution. The Northlake development plans include the replacement or realignment of the existing gas line in conjunction

with the Ridge Route Road improvements, further enhancing safety and reliability as the relocation will be further away from the landslide area that caused the rupture. In addition, , as set forth in the RPDSEIR Project Description, “an existing crude oil pipeline easement containing two oil pipelines that traverse the entire north-south length of the Project Site would be relocated to an alignment along the eastern boundary of the proposed development area and within the identified grading footprint.) (RPDSEIR, page 1-2.)

Comment No. C.7-8:
The PRDSEIR shows land in Marple Canyon owned by the Mountains Recreation and Conservation Authority (MRCA) as potential mitigation areas. The MRCA has not provided any approval or made any arrangement with the applicant. Most likely that Marple Canyon property is the only feasible location to conduct Spiny Rush mitigation. The EIR is inadequate because most likely no Spiny Rush mitigation area will be available for the project.

Response to Comment No. C.7-5: See Responses to Comment Letter C.4 (MRCA), above.

Response to Comment Letter C.8

Victoria Yundt
Lozeau Drury LLP
Supporters Alliance for Environmental Responsibility
January 27, 2026
Letter

Comment No C.8.1:

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

Response to Comment No C.8.1: This introductory comment is noted for the record and wil be forwarded to the decision makers.

Comment No C.8.2:

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

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

Response to Comment No C.8.2: With respect to the portions of the SEIR that were not recirculated, including greenhouse gas impacts, the doctrines of res judicata and collateral estoppel preclude litigation and/or relitigation of those issues. See *Ione Valley Land, Air, and Water Defense Alliance, LLC v. County of Amador* (2019) 33 Cal.App.5th 165, 171 ("Res judicata bars all of LAWDA's objections to the partially recirculated EIR certification and project approval, except for those issues arising from the partially recirculated EIR concerning traffic impacts, because the remaining issues were litigated and resolved, or could have been litigated and resolved, in connection with the first petition, and the writ of mandate did not require the County to revisit issues other than traffic impacts."); *Sierra Club v. County of Fresno* (2020) 57 Cal.App.5th 979, 990 ("[A]n order of partial decertification is not necessary to protect Developer from relitigating the CEQA compliance of parts of the EIR not affected by the errors relating to air quality impacts. Instead, Developer is protected by res judicata, collateral estoppel and the

requirement for the exhaustion of administrative remedies."); *Citizens for Open Government v. City of Lodi* (2015) 205 Cal.App.4th 296, 325-327 (res judicata barred claim that EIR failed to disclose cumulative water supply impacts as that claim was based on the same conditions and facts in existence when the original action was filed.); *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1989) 209 Cal.App.3d 1502, 1517–1518 (rejected a challenge to an EIR's impacts analysis after the issuance of a peremptory writ of mandate as beyond the scope of the additional environmental review ordered in the writ); *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 481 ("Because those challenges asserted in the new petition could have been asserted before the entry of judgment in the prior proceeding and the material facts have not changed, BEEP's challenges to the project description and to the finding on land use consistency asserted in its latest petition for writ of mandate are barred by res judicata."); *Town of Atherton v. California High-Speed Rail Authority* (2014) 228 Cal.App.4th 314, 354 ("Collateral estoppel precludes relitigation of issues argued and decided in prior proceedings."). The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment No C.8.3:

2. The RPFSEIR failed to adequately analyze vehicle miles traveled ("VMT") impacts because it applied an incorrect and outdated threshold of significance to measure impacts. The Department of Transportation's ("DOT") May 29, 2025 comment on the Draft SEIR states that the County applied an outdated threshold to measure VMT impacts. (RPFSEIR, p. A.2-3.) Specifically, the DOT explains that the County incorrectly applied the prior Northlake Specific Plan VMT per service population (27.03) as the significance threshold for determining an impact. However, the VMT per Service Population (27.03) is the baseline for comparison to the previously approved Project. The County was required to apply the VMT per Service Population (25.70) per the methodology required by the County Department of Public Works. Therefore, the RPFSEIR's less-than-significant conclusion for VMT impacts cannot be relied upon. A revised Draft SEIR should be prepared and recirculated that includes an adequate analysis of the Project's VMT impacts using the proper threshold of significance.

Response to Comment No C.8.3: See RPFSEIR Response A.2-4.

Comment No C.8.4:

3. Since the Project will have significant unmitigated impacts, the City must analyze whether the Project's economic benefits exceed its environmental impacts before adopting a statement of overriding considerations. (14 Cal. Code Regs. § 15043; Pub. Res. Code § 21081(B); *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1222.) Key among the findings that the lead agency must make is that:

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

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

Response to Comment No C.8.4: Regarding the statement of overriding considerations, CEQA does not require the County to find that the Project will provide employment opportunities for highly trained workers. The cited text is merely an example of a benefit that could support a statement of overriding considerations. As set forth in the draft CEQA findings, the Project will provide other benefits, including providing needed housing for area workers, including

affordable housing and senior housing.

Comment No C.8.5:
4. SAFER also agrees with the expert findings of the Center for Biological Diversity ("CBD") regarding the Project's significant biological resources, VMT, GHG, and wildfire risk impacts, among others. CBD reviewed the Project and the Draft SEIR and prepared expert comments on the Draft SEIR, which were submitted on May 29, 2025. CBD's comments on the Draft SEIR also apply to the RPFSEIR. SAFER adopts by reference all comments filed by CBD in this matter. CBD concluded that the SEIR failed to adequately analyze and mitigate the Project's biological resources, VMT, GHG, and wildfire risk impacts, among others. Specifically, CBD found, inter alia, that:

a. The SEIR fails to consider new information regarding significant impacts to mountain lions, burrowing owls, and wildlife movement.

b. The SEIR's analysis of impacts to special-status species, including western spadefoot, is inadequate.

c. The Project will have significant wildfire risks not analyzed or mitigated by the SEIR.

d. The SEIR fails to adequately analyze and mitigate VMT impacts.

e. The SEIR fails to consider new scientific knowledge and state policy on climate change.

f. The SEIR fails to consider significant new information regarding California's water supply.

g. The SEIR's revised alternatives analysis continues to be inadequate.

Response to Comment No C.8.5: See RPFSEIR Response B.3.

Comment No C.8.6:

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

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

Response to Comment No C.8.6: This comment is noted for the record and will be forwarded to the decision makers.

Response to Comment Letter C.9

Tony Burke
January 27, 2026
Email

Comment No. C.9-1:

I'm a homeowner in Castaic and I vehemently oppose this project. I have lived here for 30 years and what makes this area desirable is the peace and small population. The loud construction, the influx of people I'm sure will drive current residents out. Castaic is a haven away from the bustle of Santa Clarita, that's part of what makes it so desirable to live here. This project will not only disrupt that but could lead to a mass exodus of people living here. I hope you will take this into consideration as you make your choice.

Response to Comment No. C.9-1: The comment does not address the content or adequacy of the RPDSEIR under CEQA or the State CEQA Guidelines. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Response to Comment Letter C.10

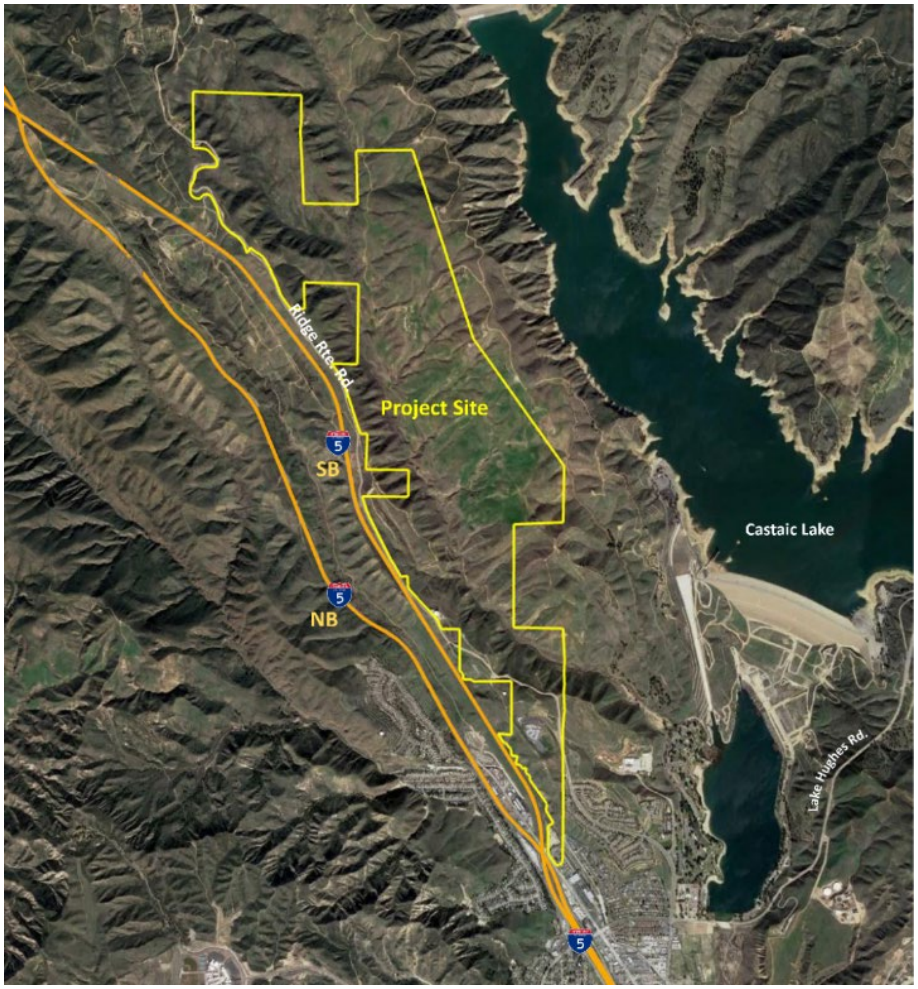
Heather Smokler
January 27, 2026
Email

Comment No. C.10-1:

I am writing express my statement against the Northlake Development Expansion. I am a resident at 28628 Cloverleaf Pl and Castaic is my home. As a resident I do not support this development. Not only is Castaic ill equipped to handle that many new residents but I fear the construction will be heavily disruptive to the community. Castaic is such a peaceful haven away from Santa Clarita. I would hate to see it ruined by traffic, noise and overcrowding. I sincerely hope you will consider the needs of the residents here as it would be a shame to drive the current residents out and ruin our peaceful home. I hope you will take this into consideration.

Response to Comment No. C.10-1: The comment does not address the content or adequacy of the RPDSEIR under CEQA or the State CEQA Guidelines. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Wildland Fire Risk Report
NorthLake Project
Addendum #2



Prepared for:
Northlake Associates, LLC
10250 Constellation Boulevard, STE 2750
Los Angeles, CA 90067

and

Los Angeles County Fire Department

Prepared By:

firesafe PLANNING, INC.

The project site is located in the northern portion of Los Angeles County along the Interstate 5 Freeway corridor adjacent to the Castaic Reservoir as shown below (Figure 1).

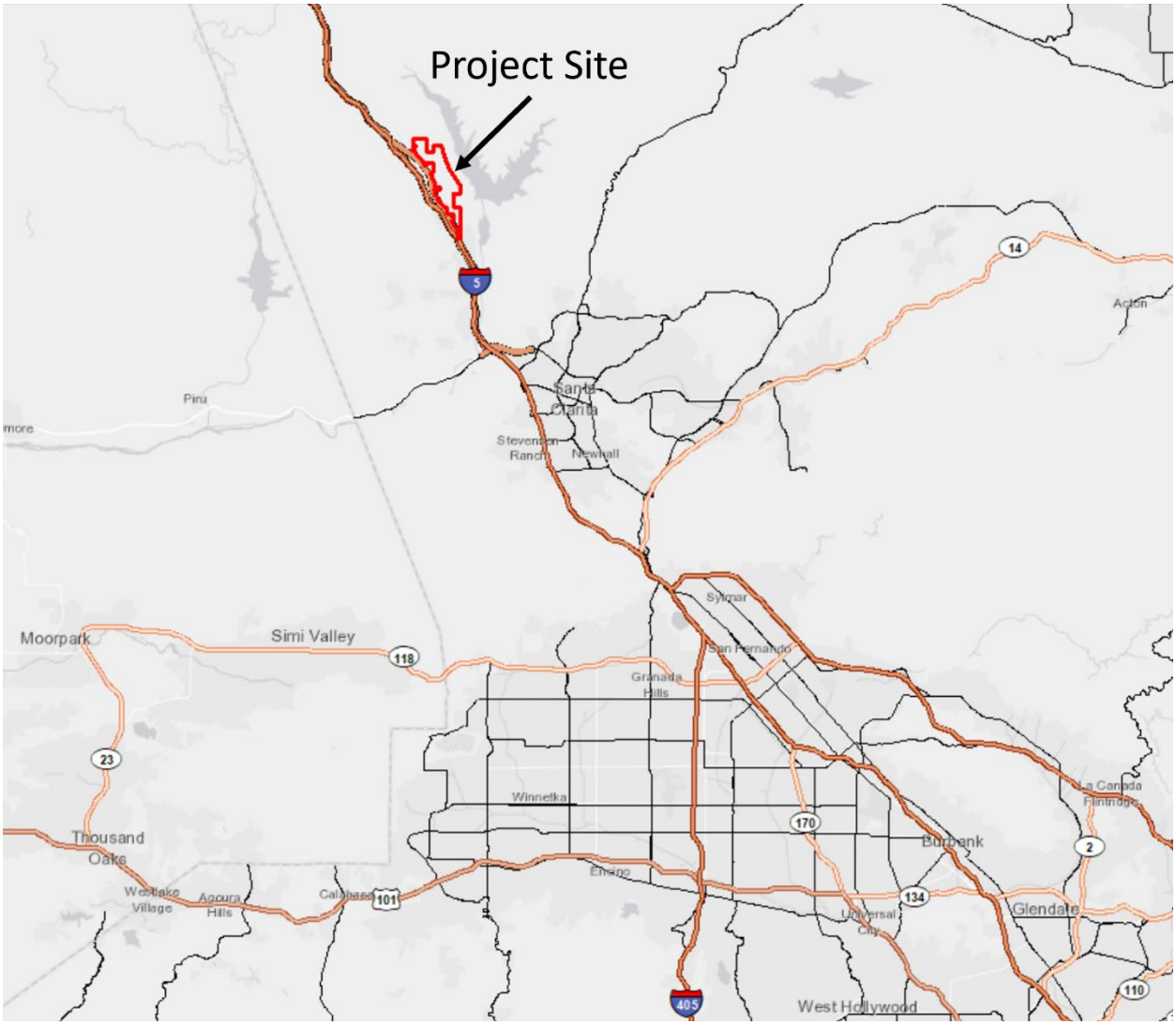


Figure 1 – Location Map

Evacuation from the area is almost entirely on the freeway with only a few alternatives present. The project site analysis has evaluated three configurations for possible development. These configurations are shown in Figure 2, on the next page, for reference.

The selection of a configuration does not directly impact the evacuation process but does have some operational impacts on the number of dwelling units, the distance to exits points and the street configurations. As can be seen in Figure 2, on the next page, the majority of the project site is the same regardless of the choice of configuration.

The freeway (I-5) and Lake (Castaic) create a condition where travel (circulation) is essentially north/south for ingress/egress. To the north is mostly undeveloped area with limited infrastructure and no services.

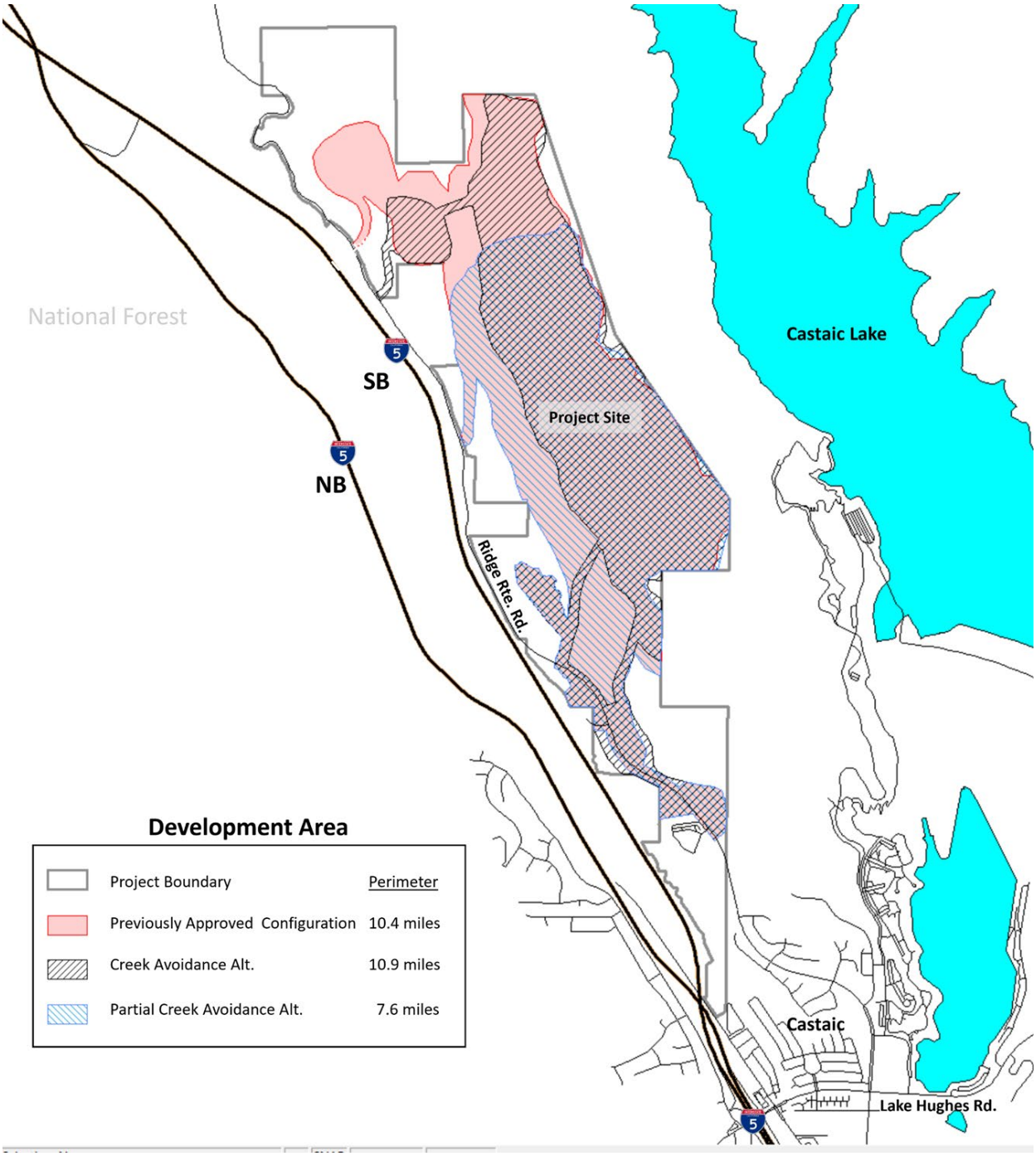


Figure 2 – Alternative Configurations

The County of Los Angeles has developed evacuation zones for use in "phased" evacuation when the need arises. Zones were developed based on topography, roads, historical weather and incidents, populations and known evacuation routes.

Zones are designed to be functional and effective emergency evacuation zones, which have the added benefit of giving all responding public safety agencies, mutual aid resources, and

cooperators a single shared reference point. The project site is in CAS-Ridge as shown in Figure 3, on the next page.

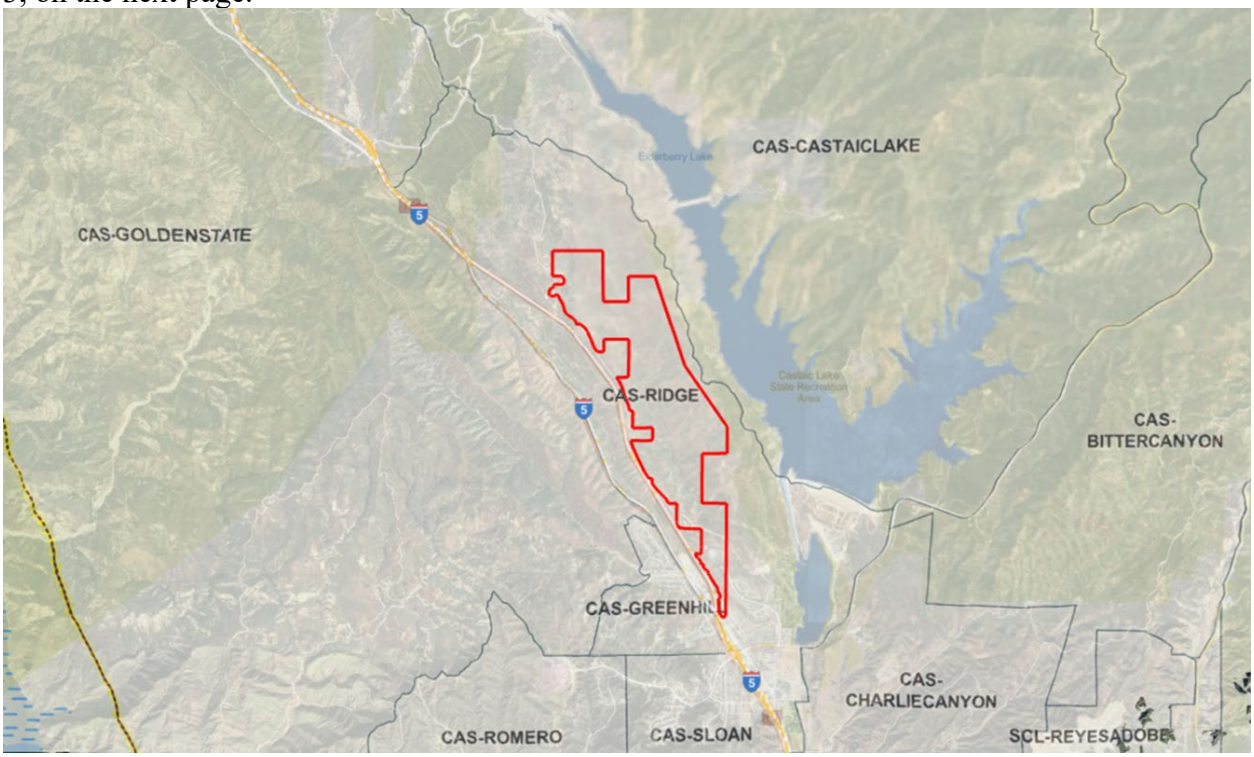


Figure 3 – Evaluation Zones

One important decision for this region is where to stop the northbound traffic on Interstate 5, once the decision to do so is made. In previous emergencies, traffic was stopped in Castaic, as has been done historically for snow or ice.

During an evacuation, this decision is extremely important. Dumping all of the northbound traffic from the freeway onto the two intersections in Castaic (Parker Road and Lake Hughes Road) creates a gridlock condition almost immediately. Closing the northbound freeway at Hasley Canyon or better yet SR126, keeps the local surface streets in Castaic free of through traffic which is being diverted. This action (closure farther south) also provides an opportunity for using the northbound lanes (at least some of them) for additional southbound egress and keeps the routes for most of the incoming emergency resources (from the south) open.

As depicted in Figure 5, on the next page, traffic from the project site is best routed south along Ridge Route Road to the southbound I-5 freeway (Green line). Alternatively, some of the flow could be routed west on Lake Hughes Road to the I-5 as a secondary route (this route is primary for southern portion of CAS-Ridge, CAS-Greenhill, CAS-Sloan and portions of CAS-Romero). This secondary route is shown in Figure 5 as a dark blue line. An alternative to the blue line is shown as an orange line on The Old Road.

Blue arrows on Figure 5 indicate additional areas that will be egressing onto Ridge Route Road as well from the east and south. These include the Castaic Lake Recreation Area and Lake Hughes Road (westbound from east of the lake), along with CAS-Charlie Canyon.

Management of key intersections along these routes is critical to effective evacuation.

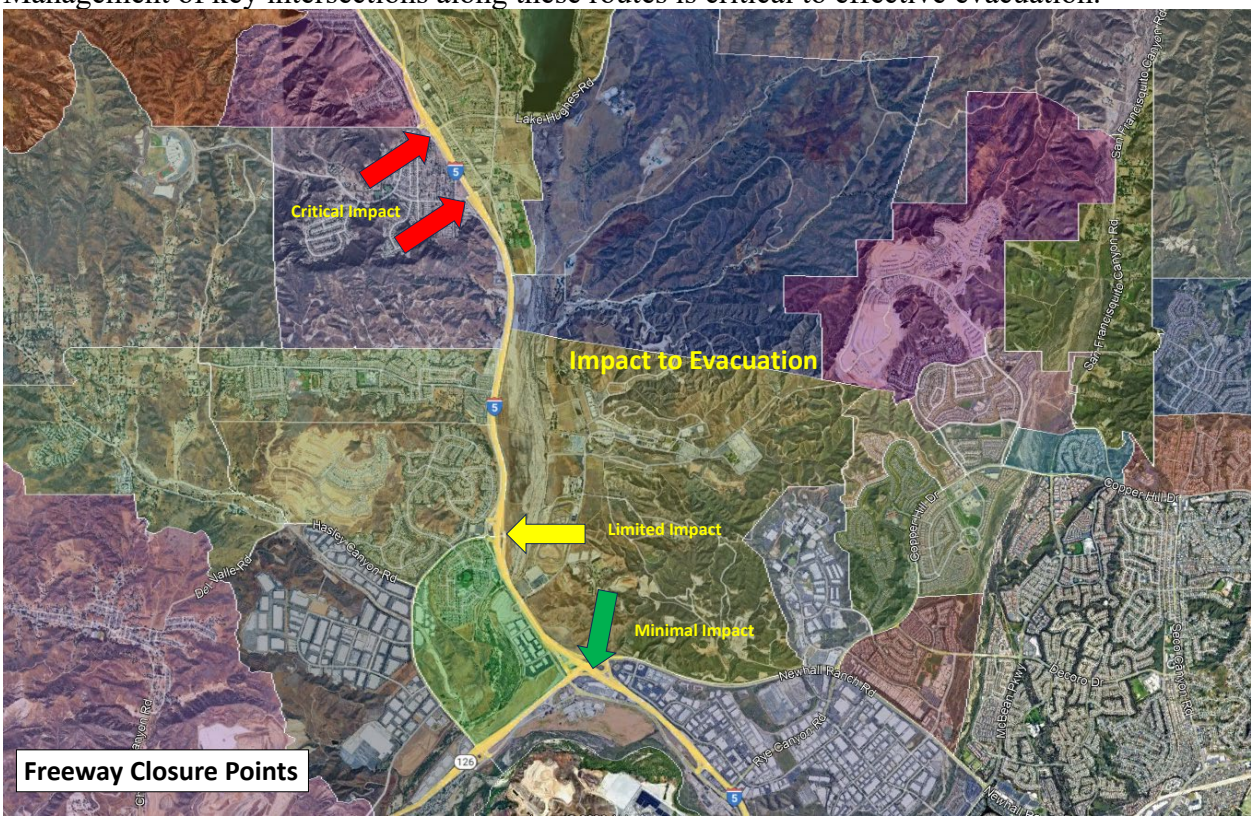


Figure 4 – Freeway Closure Points

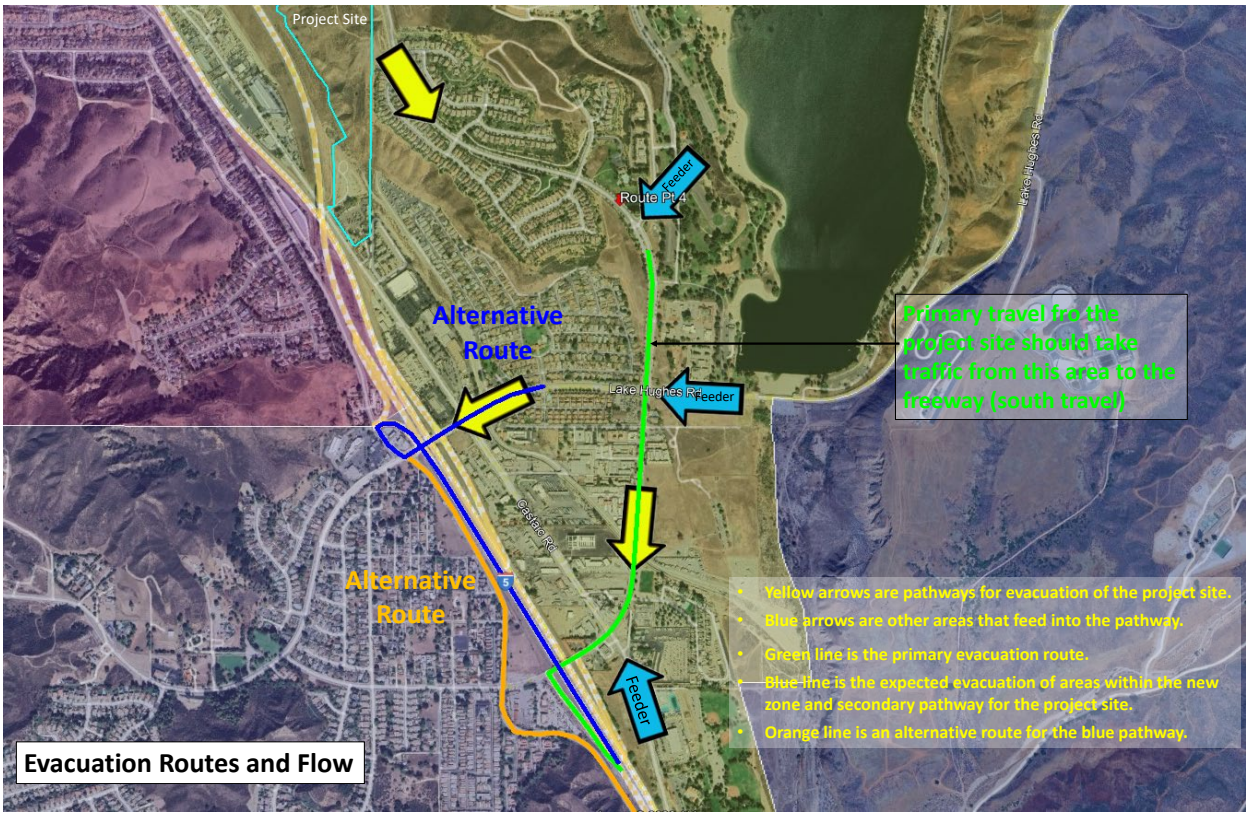
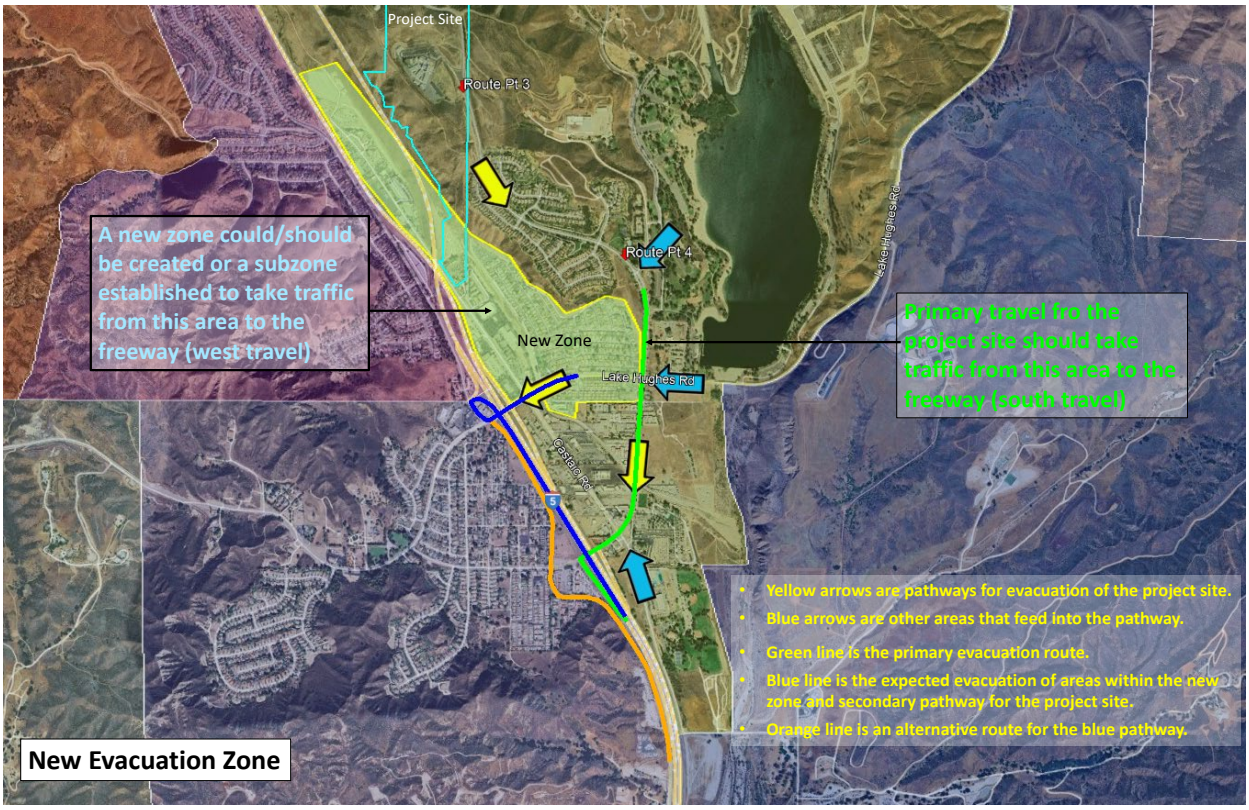


Figure 5 – Evacuation Routes and Traffic Flow

Once the project site is developed, it is likely that a new zone or a subzone will be created as shown in Figure 6, below. The area highlighted and outlined yellow below is best exited to the west at Lake Hughes Road and either onto the southbound I-5 or south on The Old Road whenever possible. Incident parameters will dictate the actual decisions but if possible and safe, this is the most effective use of egress capacity.



This addendum has been completed to provide additional information on practical egress routes, application and implementation during an evacuation of any kind. While a wildland fire is the most likely to occur, it could be any number of other scenarios which require an evacuation.